

## **Appendix C**

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# PUBLIC SCOPING SUMMARY REPORT

## SILVER STATE SOLAR SOUTH PROJECT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

Prepared for

**United States Department of the Interior**

**Bureau of Land Management**

**Las Vegas Field Office**

Prepared by

**AMEC & EPG, Inc.**

**Case No. NVN-089530**



**April 2012**

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## ACRONYMS AND ABBREVIATIONS

AC	alternating current
AMEC	AMEC Earth & Environmental, Inc.
Applicant	Silver State Solar, LLC
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
DC	direct current
DM	Departmental Manual
EITP	Eldorado to Ivanpah Transmission Project
EPA	Environmental Protection Agency
EPG	Environmental Planning Group, Inc.
ESA	Endangered Species Act
FEIS	Final Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act
ID	Interdisciplinary
kV	Kilovolt
LVFO	Las Vegas Field Office
MW	Megawatt
MWac	megawatt alternating current
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOA	Notice of Availability
O&M	Operation and Maintenance
OHV	Off-Highway Vehicle
PCS	Power Conversion Station
Plan	Preparation Plan
Project	Silver State Solar South Project
PV	Photovoltaic
QA/QC	quality assurance/quality control
RECO	Renewable Energy Coordination Office
RMP	Resource Management Plan
ROD	record of decision
ROW	right-of-way
SCE	Southern California Edison
SEIS	Supplemental Environmental Impact Statement
USC	United States Code
WOUS	Waters of the United States

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## **INTRODUCTION**

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This Public Scoping Summary Report has been developed by the United States Department of the Interior, Bureau of Land Management (BLM), Las Vegas Field Office (LVFO) to present a summary and overview of the public scoping process conducted for the proposed Silver State Solar South (Project) Supplemental Environmental Impact Statement (SEIS). It documents the public scoping process, summarizes public and agency comments received during the scoping period, describes the analysis of those comments, and provides a preliminary list of issues to be addressed in the SEIS.

### **PROJECT BACKGROUND**

Silver State, a wholly owned subsidiary of First Solar, Inc., has applied to the BLM LVFO for a right-of-way (ROW) on federal land to construct and operate the Silver State Solar South Project (Project). The proposed 350-megawatt alternating current (MWac) solar photovoltaic (PV) power generation facility would be located in the Ivanpah Valley, 40 miles south of Las Vegas, and approximately 2 miles east of Primm, Nevada. The Project boundary encompasses approximately 12,563 acres of federal, BLM-managed lands located entirely within Clark County.

Significant portions of the Project were previously evaluated in the Final Environmental Impact Statement (FEIS) for the Silver State Solar Energy Project. The FEIS analyzed the development of a 400-megawatt (MW) PV solar project to be constructed in three phases. Phase I consisted of the construction, operation, maintenance, and decommissioning of a 60-MW solar plant including associated facilities. Phase II and III included construction and operation of the two remaining solar plants and the infrastructure to complete the 400-MW project. The FEIS assessed the potential environmental impacts of issuance of the ROW grants and identified mitigation measures for impacts that could be significant and adverse.

On October 12, 2010, the BLM signed the Record of Decision (ROD) for the Silver State Solar Energy Project. The ROD was specific to the first phase – the 60-MWac Silver State Solar Project, and indicated that subsequent phases (Phases II and III) would be reviewed to assess consistency with the prior environmental review conducted as part of the FEIS. On May 18, 2011 the BLM issued a Notice to Proceed authorizing construction of the 50-MWac Silver State Solar North Project on approximately 618 acres.

In early 2011, in response to BLM and stakeholder feedback and to address sensitive resource and development issues, Silver State submitted a new ROW application (NVN-089530) to secure an additional 5,176 acres of BLM-administered lands in order to modify the project layout for Phase II and III. The ROW application, submitted in February 2011 and amended in March 2011 was assigned BLM serial number NVN-089530. Following review of the revised project layout and in consideration of stakeholder feedback, the BLM determined that a SEIS must be prepared to analyze the change in design and location. The SEIS will address new information associated with the Silver State South Project and it will also consider an amendment to the LVFO Resource Management Plan (RMP) regarding proposed land and resource use changes within the

Jean Lake/Roach Lake Special Recreation Management Area that would be required to allow construction and operation of the Silver State South Project.

Pursuant to the National Environmental Policy Act (NEPA), if substantial changes to a Proposed Action are relevant to environmental concerns, then a SEIS must be prepared to provide a basis for rational decision-making and give the public and other agencies an opportunity to review and comment on the analysis of the changes or new information (40 Code of Federal Regulations [CFR] 1502.9(c)(4)).

To comply with the requirements of NEPA, the BLM is preparing a SEIS to disclose the potential environmental impacts associated with construction and operation of the Project, and to consider alternatives to the proposed Project. The SEIS will consider the environmental impacts associated with granting the Proponent a ROW for construction and operation of a solar facility in Clark County, Nevada. The BLM will use the SEIS in rendering a decision whether to grant, deny, or modify the requested ROW and it will also consider an amendment to the LVFO Resource Management Plan (RMP) regarding proposed land and resource use changes within the Jean Lake/Roach Lake Special Recreation Management Area that would be required to allow construction and operation of the Silver State South Project.

## **DOCUMENT ORGANIZATION**

This document contains summary descriptions of the following:

- Public scoping meetings, including public notices announcing meetings and opportunities for public and agency comments during the scoping period
- Public scoping content analysis process, including how individual letters and comments were coded and tabulated
- Public scoping comment summaries and preliminary issue statements, organized by resource
- Appendices containing copies of the Federal Register Notice of Intent, meeting announcements and outreach materials, meeting sign-in sheets, meeting presentation materials and handouts, scoping comment respondent contact information, and all comments received during the public scoping period in a tabular format

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## **PUBLIC SCOPING PROCESS**

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This section documents the purpose and objectives of public and agency scoping, provides a description of the process, identifies the techniques that were used to notify the public about the Project and scoping, and gives a brief summary of the public scoping meetings.

### **DESCRIPTION OF PROCESS**

Public scoping is an integral part of the NEPA planning process. It provides “an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action” (40 CFR 1501.7). Public and agency input is solicited in order to identify the range, or scope, of issues to be addressed during the environmental analysis and in the SEIS. The objectives of public and agency scoping for this federal action are outlined below.

- Engage federal, state, local, and tribal governments and the public in the early identification of concerns, potential impacts, and possible alternative actions
- Consult government-to-government with all affected tribes
- Bring agencies and applicants together to:
  - lay the groundwork for setting time limits in processing the ROW application
  - expedite reviews where possible
  - integrate other environmental reviews, as applicable
  - identify any major obstacles that could delay the ROW application process
- Bring together interested parties to:
  - discuss the scope of the proposed action and alternatives
  - identify significant issues relating to SEIS preparation
- Identify:
  - the proposed action/range of actions
  - significant issues related to the proposed action
  - significant cumulative effect issues
  - other actions that may contribute to cumulative effects
  - geographic scope
  - the scope of issues to be addressed
  - the timeframe for which the impacts are to be analyzed
  - impact topics/potential impacts/impacts to be considered
  - additional information which may be necessary to conduct the analysis
  - alternatives/possible alternative actions/publicly developed alternatives
  - national, state, and local concerns
- Avoid the late introduction of issues and alternatives

- Integrate analyses required by other environmental laws (e.g., Endangered Species Act [ESA] and National Historic Preservation Act [NHPA])
- Integrate other planning activities for separate projects that may have similar or cumulative impacts

## **PUBLIC SCOPING OUTREACH ACTIVITIES**

Initiation of the EIS process and the public scoping meetings were announced through the Federal Register, BLM media releases, direct mailings, and postings on the BLM Project website. These activities are described below.

### **Federal Register Notice of Intent**

The BLM Federal Register Notice of Intent, published on September 1, 2011 (Volume 76, Number 170, Pages 54483-54484), marked the beginning of the public scoping period for the Project SEIS (Appendix A). The 60-day scoping period was announced as ending on October 31, 2011. Three scoping meetings were held from September 27 through September 29, 2011. Comments received during the scoping period are analyzed in this Public Scoping Summary Report.

### **Media Release**

The BLM prepared a media release to introduce the Project, announce the initial scoping meetings, and invite the public to provide input. The news release was issued on September 1, 2011 to local and regional newspapers, congressional offices, television stations, and radio stations. The media release is included in Appendix B.

In addition, paid advertisements were published in the following local newspapers (Appendix C):

- Las Vegas Review-Journal—advertisements published on September 12, 13, and 14, 2011
- Pahrump Valley Times—advertisement published on September 14, 2011

Affidavits of the published newspaper releases are available in Appendix C.

### **Direct Mailings**

A public scoping notice was prepared and mailed to inform the public about the scoping process for the preparation of the SEIS and the scheduled scoping meetings. The public was invited to participate in the scoping process and to share any concerns or comments, submit information, and identify issues to be addressed during the SEIS process. A copy of the public scoping notice is provided in Appendix D.

The notice was mailed to federal, state, and local agencies; elected officials; Native American tribes; special interest groups and organizations; and the general public, during the week of September 7, 2011. The distribution list included 1,071 notices, and was compiled from a list of individuals, organizations, and agencies who had expressed interest in other BLM LVFO

projects. A copy of the affidavit confirming that the notices were mailed is included with Appendix D.

### **Public and Agency Scoping Meetings**

The BLM held three public scoping meetings to identify issues and concerns regarding the proposed Project. These scoping meetings provided an opportunity for the public to learn about the proposed Project and to provide comments. Meeting locations, dates, and times are provided in Table 1.

<b>TABLE 1. PUBLIC SCOPING MEETINGS</b>			
<b>Location</b>	<b>Date</b>	<b>Time</b>	<b>Attendance*</b>
Primm, NV	September 27, 2011	6:00 – 8:00 p.m.	7
Las Vegas, NV	September 28, 2011	6:00 – 8:00 p.m.	30
Jean, NV	September 29, 2011	6:00 – 8:00 p.m.	6
Total			43

\*These counts reflect only those attendees who elected to sign in at the door.

### **Public Scoping Meeting Format**

At each meeting, attendees were greeted at the entrance and asked to provide contact information on meeting sign-in sheets. Attendees were informed about the meeting format and given a public scoping fact sheet and a comment form. In addition, attendees were informed about ways to submit comments to the BLM and were informed about the flow of information on the display boards in the room. Copies of the sign-in sheets are provided in Appendix E; and copies of the display boards, comment form, and newsletter are provided in Appendix F.

The meeting format included an open house period, followed by a brief presentation of the proposed Project and NEPA process. During the open house period, representatives from the BLM; Silver State Solar, LLC; AMEC; and EPG were available to answer questions about the proposed Project and explain the NEPA process. A court reporter was present at all meetings to document the comments made. Each of the meetings began with a statement by the moderator who provided an overview of the proposed Project and the goals and objectives of the NEPA process, followed by brief statements from the BLM describing BLM roles and responsibilities.

During the public scoping, members of the public were provided a separate comment form if they wanted to make an oral comment during the meeting. Commenters were called in the order of comments received and were asked to limit their comments to three to five minutes to allow all those who wished to speak time to do so.

## **AGENCY COORDINATION**

### **Cooperating Agencies**

Cooperating agency status provides a formal framework for governmental agencies to engage in active collaboration with a federal agency to implement the requirements of NEPA (42 USC 4321, et seq.). Federal and state agencies and local and tribal governments may qualify as cooperating agencies because of “jurisdiction by law or special expertise” (40 CFR 1501.6 and 1508.5).

On November 23, 2011, the BLM Southern Nevada District Office sent an invitation to federal, state, and local agencies to be cooperating agencies for the Silver State Solar South SEIS and the Hidden Hills Transmission Project EIS. This letter requested agencies to indicate via written letter if they were interested in becoming a cooperating agency for either of the two projects. A copy of the notification letter is included in Appendix G. The following agencies were invited to participate as cooperating agencies for the Silver State Solar South SEIS and the Hidden Hills Transmission Project EIS:

- Army Corps of Engineers
- Bureau of Reclamation, Lower Colorado Regional Office
- City of Boulder City
- City of Henderson
- City of Las Vegas
- City of Mesquite
- City of North Las Vegas
- Clark County
- Clark County Regional Flood Control District
- Clark County Department of Aviation
- Department of Defense
- Department of Energy, Loan Guarantee Program Office
- Federal Aviation Administration
- Federal Aviation Administration, Western Pacific Region Airport Division
- National Nuclear Security Administration
- National Park Service, Death Valley National Park
- National Park Service, Lake Mead National Recreation Area
- Nellis Air Force Base
- Nevada Department of Mines
- Nevada Department of Transportation
- Nevada Department of Wildlife
- Nye County
- Nye County Board of County Commissioners
- Nye County Nuclear Waste Repository Project Office
- Southern Nevada Water Authority
- United States Department of Transportation, Federal Highway Administration
- United States Environmental Protection Agency

- United States Fish and Wildlife Service
- United States Geological Survey

As of December 31, 2011, the United States Environmental Protection Agency, Clark County Department of Aviation, and National Park Service (Mojave National Preserve) have accepted cooperating agency status. The City of North Las Vegas, the United States Geological Survey, and the United States Fish and Wildlife Service have declined cooperating agency status.

### **Native American Consultation**

In accordance with Section 106 of the NHPA, the lead federal agency and cooperating federal agencies are required to consider the effects of the agencies' undertakings on properties listed in or eligible for the National Register of Historic Places. Eligible properties can include a diversity of archaeological, historical, and traditional cultural resources. The Protection of Historic Properties (36 CFR 800) implement Section 106 and define a process for federal agencies to use in consulting with State Historic Preservation Officers and other interested parties as they assess the effects of their undertakings.

Pursuant to those regulations, on August 16, 2011 the BLM distributed certified letters to the Las Vegas Paiute Tribe, Fort Mojave Indian Tribe, Colorado River Indian Tribes, Chemehuevi Indian Tribe, Moapa Band of Paiutes, Pahrump Paiute Tribe (not sent certified). The tribes were invited to provide input on potential impacts on culturally significant areas within the proposed Project area. A copy of the tribal consultation letters and complete tribal contact information is located in Appendix G.

In recognition of the special relationship with the United States Government, the BLM will consult with the appropriate tribal governments at an official, executive-level (government-to-government), in accordance with the NHPA. The BLM will provide opportunities for government officials of federally recognized Native American tribes to comment on and participate in the preparation of the SEIS. The BLM will consider comments, notify consulted tribes of final decisions, and inform them of how their comments were addressed in those decisions. At a minimum, officials of federally recognized tribal governments will be offered the same level of involvement as state and county officials.



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## COMMENT ANALYSIS

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### INTRODUCTION

Members of the public and representatives of agencies were afforded several methods for providing comments:

- Comments could be recorded on comment forms or provided verbally at the public scoping meetings
- Email comments could be sent to a dedicated email address: SilverStateSouthEIS@blm.gov
- Individual letters and comment forms could be mailed via U.S. Postal Service to BLM Las Vegas Field Office, Attn: Gregory Helseth, 4701 North Torrey Pines Drive, Las Vegas, Nevada 89130-2301
- Faxed comments could be sent to (702) 515-5010 (Attn: Gregory Helseth)

During the public scoping period (September 1 through October 31, 2011), a total of 59 comment documents were received. A comment document is defined as an oral comment recorded as part of a public scoping transcript, email, fax, letter, or comment form. Because some comment documents had more than one comment, the total number of comments received is greater than the number of comment documents. Table 2 presents the method for submittal of all responses.

TABLE 2. COMMENT METHOD OF SUBMITTAL	
Method of Submittal	Comment Documents Received
Comment form	3
Email	30
Letter or Fax	15
Scoping meetings (oral comments)	
Pimm scoping meeting	1
Las Vegas scoping meeting	8
Jean scoping meeting	2
Total comment submittals	59

### PROCESSING COMMENTS

A comment database was developed in Microsoft Access to help track and categorize comments. The database provides specialized query and report capabilities. Each comment document was numbered sequentially (beginning with 1), with each comment in the document assigned an individual number, which can be associated with one or more resource category. This coding

combination results in a unique identifier for each comment contained in the document. This system provides ease in referencing and cross-checking the comment document received and the comments contained within them.

Comments were categorized by primary topic, regardless of the position of the comment towards the topic. Most comments addressed more than one category, or topic; these comments were categorized by the driving topic unless the associated topics were of equal importance to the issue being presented, in which case the comment was placed under both categories. This form of analysis allows for specific comments to be captured and grouped by general topic or resource issue. Table 3 displays the relative interests of respondents who submitted comments on various topics. This breakdown is not intended to show bias towards any issue; it simply indicates interest in various issues. All issues will be addressed equally in the SEIS.

## **COMMENT SUMMARIES AND ISSUE STATEMENTS**

The following subsections are identified by resource or topic and include a summary of public and agency comments received during the scoping period. Preliminary issues, concerns, and opportunities are summarized within each resource or topic subsection to be addressed in the Draft SEIS.

This summary is intended to reflect all comments received during the scoping phase equally and does not attempt to assign value to any comment. This document is intended to assist the BLM in developing the scope of analysis to be conducted in the SEIS on the basis of public and agency input. Therefore, specific comments and context are not provided here, only ideas represented in those comments that can be applied directly to preparation of the SEIS. For example, some respondents provided their views on the value (negative or positive) of solar energy development; however only the issue areas they raised in conjunction with their views are presented in this Public Scoping Summary Report. The comments received during the scoping period are included in a tabular format in Appendix H and copies of the individual responses are available for review at the BLM Las Vegas Field Office.

The preliminary list of issues, concerns, and opportunities was developed from comments received and input by resource specialists. These issue statements will be used to inform the data collection and analyses for the SEIS.

## **NEPA PROCESS**

- Commenters expressed concern that they were not properly notified of the scoping meeting dates, times and locations.
- One commenter stated that through the NEPA process they would like to see the development of mitigation by this project for the loss of mitigation actions previously funded by Clark County for non-federal actions covered by an incidental take permit.
- Respondents requested additional information about the reasons for an RMP amendment.

## ***Issues to be Addressed in the SEIS***

- Describe BLM's legal responsibilities under NEPA.

<b>TABLE 3. TOPICS OF INTEREST</b>	
<b>Comment Category</b>	<b>Number of Comments Received</b>
NEPA and NEPA Process	12
Alternatives	25
Air Quality	4
Climate Change	5
Cultural and Historic Resources	5
Cumulative Impact	17
Environmental Justice	1
Fire Management	1
Geology and Mineral Resources	1
Hazardous Materials and Solid Waste	2
Land Use	6
Livestock Grazing	1
Noise	2
Noxious and Invasive Weed Control	5
Project Design	15
Purpose and Need	2
Recreation	25
Socioeconomic Resources	22
Soil Resources	1
Special Designation	10
Special Status Species	26
Travel Management and OHV Use	33
Vegetation Resources	3
Visual Resources	8
Water Resources	12
Watershed Management	2
Wildlife Resources	10
Other	21
Total	208

- Describe BLM's purpose and need as related to the proposed Project and RMP Amendment and how the BLM will analyze the applicant's proposal in the SEIS.

## ALTERNATIVES

- One commenter stated that a “conservation alternative” should be the preferred alternative. The “conservation alternative” would preclude siting the Project in the proposed ROW area and would preclude any further development of BLM lands in the Ivanpah Valley.
- Respondents requested that the “no action” alternative be implemented on the Project.
- Commenters stated that other BLM administered lands such as the Apex Valley, the Eldorado Valley, the Ivanpah Valley across the California border, and the Nevada portion of the Ivanpah Valley on the west side of I-15 should be considered as alternative locations for the Project.
- Commenters stated that the Project should be relocated to more urbanized, degraded, contaminated, disturbed sites such as nearby private lands, brownfields, existing rooftops in the Las Vegas area, fallow or abandoned agricultural lands, and undeveloped parcels within the urban areas of Clark County.
- One commenter stated that the SEIS should describe how each alternative was developed, how it addresses each project objective, and how it will be implemented.
- Commenters stated that they were in favor of renewable energy, just not at the proposed location.

### *Issues to be Addressed in the SEIS*

- What other Project area configurations or technologies would meet the Project purpose and need and reduce impacts to resources?
- Are there other locations for the Project that would reduce potential use conflicts and meet the Project purpose and need, even if they are not located on public land?
- How will each alternative be developed? How will each alternative address the Project’s purpose and need? How will each alternative be implemented?

## AIR QUALITY

- One commenter expressed specific concern about two causes of air quality concerns: vehicle traffic and combustion emissions from equipment and dust control due to the method of site preparation.
- A respondent requested that the SEIS provide a detailed discussion of ambient air conditions, National Ambient Air Quality standards, and criteria pollutant non-attainment areas in all areas considered for solar development.
- One commenter stated that a Construction Emissions Mitigation Plan should be drafted and adopted in the Record of Decision.

### *Issues to be Addressed in the SEIS*

- What effect would construction and operation of the facility have on local and regional air quality?
- What opportunities exist to reduce impacts to air quality through mitigation plans; for example, fugitive dust control and equipment emissions mitigation plans?
- How will the mitigation of construction emissions be handled for the Project?

## CLIMATE CHANGE

- Specific concerns were expressed regarding climate change or climate fluctuation from the Project, and its effects on the migration of species through the corridor.
- Commenters stated each proposed alternative must consider the Project's impact with respect to global climate change.
- A respondent stated that the SEIS should consider how existing and/or proposed water sources for the Project may be affected by climate change.

### *Issues to be Addressed in the SEIS*

- How should potential changes in climate be measured and quantified in the SEIS?
- How might climate change affect the migration of species through the Project site?
- How might climate changes affect cumulative impacts?

## CULTURAL AND HISTORIC RESOURCES

- Commenters expressed concern about preserving any archaeological and paleontological sites or artifacts found in the area.
- One respondent stated that the proposed Project and any new transmission lines could cause physical damage to artifacts and sites, expose cultural resources to looters, and increase fires due to soil disturbances and weed invasion that would place any existing cultural resources at risk of future damages.
- Commenters requested an archeological survey be performed in the Project area.
- One commenter requested that the SEIS describe the process and outcome of government-to-government consultation between the BLM and each of the tribal governments within the project area, including issues that were raised and how those issues were addressed in the selection of proposed alternatives.

### *Issues to be Addressed in the SEIS*

- How would construction and operation of the Project affect historic and cultural resources?
- What was the outcome of government-to-government consultation between the BLM and each of the tribal governments within the project area?

## CUMULATIVE IMPACTS

- One commenter stated that the SEIS should provide a detailed review and analysis of the cumulative impacts of the proposed project, and all associated infrastructure including roads and transmissions lines on the desert tortoise population.
- Commenters stated that a cumulative impacts analysis be conducted that considers consumptive uses—both in California and Nevada—such as grazing, Off-Highway Vehicle (OHV) activity, mining and the existing and other proposed projects in the surrounding area including the Proposed Project, other renewable energy projects, gas and electrical transmission facilities, Desert Xpress Railroad, the Kern River Gas Pipeline extension, and the Southern Nevada Supplemental Airport.
- A respondent stated that cumulative impacts need to be analyzed and considered in the context of various laws and regulations pertaining to management of public lands, including the Endangered Species Act, Federal Land Policy and Management Act, and BLM Manuals

6840 (Special Status Species Management), 6500 (Wildlife Habitat Management) and 4180 (Public Land Health).

***Issues to be Addressed in the SEIS***

- What would the cumulative effect of the proposed Project combined with other reasonably, foreseeable future projects be on the regional landscape?
- What are the cumulative impacts of the proposed Project on the desert tortoise population?

**ENVIRONMENTAL JUSTICE**

- One commenter requested an evaluation of environmental justice populations within the geographic scope of the project; and if such populations exist, the SEIS should address the potential for disproportionate adverse impacts to minority and low-income populations, and the approaches used to foster public participation by these populations.

***Issues to be Addressed in the SEIS***

- What effect could the Project have on minority and low-income populations?

**FIRE MANAGEMENT**

- One commenter stated that the SEIS should address the effects each alternative will have on wildfire risk from increased motorized vehicle access and the spread of invasive weeds.

***Issues to be Addressed in the SEIS***

- How could the Project be designed in a way to reduce the introduction of invasive and noxious weeds?

**GEOLOGY AND MINERAL RESOURCES**

- One commenter stated that the Project area is in conflict with four active placer mining claims.

***Issues to be Addressed in the SEIS***

- How will the project affect access to known mineral resource areas and existing mining claims?

**HAZARDOUS MATERIALS AND SOLID WASTE**

- One commenter stated that the SEIS should disclose any potential toxic or hazardous wastes that may be associated with the Project during construction, operation, and maintenance, including pesticides and herbicides.
- A respondent requested that the SEIS include a plan for decommissioning and site restoration.

***Issues to be Addressed in the SEIS***

- What types of hazardous materials will be used and stored at the facility during both construction and operations?

- What are the plans for decommissioning of the Project?

### **LAND USE**

- One commenter stated that multiple land use must be maintained.
- A respondent stated that the SEIS should discuss how the Project would support or conflict with the objectives of federal, state, tribal, or local land use plans, policies, and controls in the Project area.

#### ***Issues to be Addressed in the SEIS***

- What effect would the construction and operation have on multiple land uses of federal land?
- Is the Project consistent with existing federal, state, tribal and local land use plans?

### **LIVESTOCK GRAZING**

- One commenter stated that the SEIS should include an assessment of the direct, indirect, and cumulative impacts of the Jean/Roach Lake and McCullough Mountains grazing allotments.

#### ***Issues to be Addressed in the SEIS***

- What effect would construction and operation of the Project have on livestock grazing within the Jean/Roach Lake and McCullough Mountains grazing allotments?

### **NOISE**

- One commenter expressed concern that the Project would increase noise levels in Primm, Nevada.

#### ***Issues to be Addressed in the SEIS***

- What effect would noise from construction and operation of the Project have on the town of Primm?

### **NOXIOUS AND INVASIVE WEED CONTROL**

- Commenters stated that the construction of access roads and transmission lines will lead to proliferation of invasive, non-native grasses and weeds, which will have negative impacts on fire management, soils, and, rare plants.
- One commenter stated that the SEIS should include an assessment of the direct, indirect, and cumulative impacts on the areas where Clark County funds have provided for weed monitoring and treatment activities, including the Interagency Weed Sentry Project.
- A commenter was concerned that the chemicals utilized to control noxious and invasive weeds will have negative impacts on the environment, species, and the watershed.
- A respondent requested that the SEIS include an invasive plant management plan to monitor and control noxious weeds.

#### ***Issues to be Addressed in the SEIS***

- What mitigation efforts will be made to ensure that noxious and invasive weeds are not spread to the Project site and the surrounding area?

- What effects would occur from chemical treatment of noxious and invasive weed?

## **PROJECT DESIGN**

- Commenters asked about the need for a 13,000-acre ROW area when the project is only on 2,900 acres.
- Respondents expressed concern that historical OHV race routes will not be accessible with the proposed layout of the solar panels.
- One commenter stated that a portion of the ROW request impinges upon a site identified by the Clark County Department of Aviation as necessary for stormwater and flood control purposes to serve the Southern Nevada Supplemental Airport project.

### ***Issues to be Addressed in the SEIS***

- What portion of the requested ROW will be utilized for construction of the Project?
- How will the Project affect public access and OHV use?
- How will the Project affect the Southern Nevada Supplemental Airport project and its ancillary uses?

## **PURPOSE AND NEED**

- A commenter stated that the Purpose and Need statement should not simply indicate that the BLM is responding to an applicant's right of way application, as it has done for this and previous renewable energy projects.
- One respondent requested that the Purpose and Need statement be a clear, objective statement of the rationale for the Project; and should discuss the Project in the context of the larger energy market that the Project would serve.
- A commenter stated that the SEIS should clarify if the power generated by the Project would be delivered to the California or Nevada market and if a power-purchase agreement has been signed.

### ***Issues to be Addressed in the SEIS***

- Describe BLM's purpose and need as related to the proposed Project

## **RECREATION**

- Commenters had concerns about impacts to recreation in the area—specifically organized OHV races and other OHV uses.
- Commenters stated that recreational access to the area has been available to the public for decades and there was concern about future access.
- One commenter asked if the BLM would offer any mitigation for the loss of recreation.

### ***Issues to be Addressed in the SEIS***

- What effect would construction and operation of the Project have on the dispersed recreation and organized OHV races?



## SOCIAL AND ECONOMIC RESOURCES

- Commenters expressed concern over the economic impact to the Primm resorts and other nearby local businesses if the competitive OHV races lose access to racing routes located in the Project area.
- Commenters wanted more information on the economic impact to the tour companies that use the area for commercial tours on a daily basis.
- One commenter stated that the cost per kilowatt of solar power produced at the proposed Project makes it an irresponsible and costly experiment.

### ***Issues to be Addressed in the SEIS***

- What would the economic impact be to the Primm resorts and the surrounding businesses during construction and operation of the Project?
- What would the economic impact be to the commercial tour companies during construction and operation of the Project?

## SOIL RESOURCES

- A Respondent stated that soil erosion on low fill slopes and steeply graded areas could result in sedimentation of water bodies; and that changes in soil movements may impact rare plants and habitats for sensitive species.

### ***Issues to be Addressed in the SEIS***

- What effect would the construction and operation of the Project have on soils in the Project area?

## SPECIAL DESIGNATION

- Commenters requested the SEIS address impacts to the 1994 Desert Tortoise Recovery Plan.
- One respondent voiced concern over the impact the Project will have on the ongoing Las Vegas BLM RMP revision, and stated the Project should be delayed pending completion of the RMP amendment.
- One commenter requested the SEIS fully review the impacts of each alternative on the nearby National Preserve and Wilderness areas.

### ***Issues to be Addressed in the SEIS***

- What effect would construction and operation of the Project have on the resource values and desired visitor experiences to the nearby special management areas?
- What impacts to the 1994 Desert Tortoise Recovery Plan would occur from the construction and operation of the Project?

## SPECIAL STATUS SPECIES

- Commenters expressed concern over impacts to the desert tortoise from the construction and operation of the Project.

- A commenter stated that the continued fragmentation of desert tortoise habitat in this area of the Mojave Desert may pose a significant threat to the viability of the Northwest Mojave subpopulation of the desert tortoise.
- Commenters expressed concern about maintaining habitat connectivity at the landscape level to allow for self-sustaining desert tortoise populations.
- Respondents stated that there are a number of rare and sensitive plant species found in the area, and the SEIS should provide a detailed vegetation and wildlife map to facilitate public input.
- A commenter requested that the SEIS discuss mitigation ratios for tortoise habitat and how these relate to the mitigation ratios recommended by other agencies, as well as how they relate to mitigation ratios used for other renewable energy projects in California and Nevada.

***Issues to be Addressed in the SEIS (See Wildlife Resources)***

- What effect would construction and operation of the Project have on local populations of ESA-listed or candidate species or other special status species and suitable habitats?
- What effect will the Project have on all native plant species in the area, including sensitive species?
- What mitigation measures are proposed for desert tortoise, including habitat connectivity?

**TRAVEL MANAGEMENT AND OHV USE**

- Commenters asked about impacts from the construction and operation of the Project to OHV use in the Project and nearby areas.
- Respondents voiced concerns over whether or not public access in the Project area will be maintained.
- One commenter stated that the Project area is perfect for OHV racing because the soil is sand and decomposed granite-based, unlike other areas that have a high alkali-based soils that cause dust and erosion.
- Multiple respondents stated that the Project area has been used for competitive OHV races for decades and there is concern over the ability of the OHV races and the Project to co-exist.
- A commenter stated that the Project area should not be open to OHV use because of the combined impacts from the Project and OHV use to the already heavily fragmented desert tortoise population.

***Issues to be Addressed in the SEIS***

- What effect would construction and operation of the Project have on both competitive racing and dispersed OHV use?
- Will any existing race routes be closed due to the construction and operation of the Project?

**VEGETATION RESOURCES**

- One commenter expressed concern that sheet flooding on the Project site would have a negative impact on the vegetation down slope from the Project.
- A respondent stated that the SEIS should provide detailed vegetation maps to facilitate public input.

### ***Issues to be Addressed in the SEIS***

- What effects will the rainfall have on vegetation located down slope of the Project?

### **VISUAL RESOURCES**

- Commenters stated that solar panels on the public lands above Primm will have a negative impact on the viewshed.
- A respondent stated that the Project will negatively impact the visual resources of Southern Nevada, which brings tourism and revenue to local communities.
- One commenter expressed concern regarding the visual resource impacts to the nearby Mojave National Preserve and designated Wilderness areas.
- Respondents were concerned with what mitigation efforts will be utilized to minimize the visual impact.

### ***Issues to be Addressed in the SEIS***

- What effect will the proposed Project have on scenic quality and scenic vistas of the surrounding area?
- What mitigation efforts will be utilized to minimize visual impacts of the Project?

### **WATER RESOURCES**

- Commenters expressed concerns about increased flood problems and requested that flood control evaluations are completed to demonstrate that no negative effects result from the Project.
- One commenter stated that the ROW application did not indicate the projected water demand during construction, and requested information on the source of water during construction, if it will be groundwater, quantity of water for the entire construction period, annual maximum extraction, and wellhead location.
- Respondents inquired about the quantity of water for the construction and operation period, annual maximum extraction, the source of water during construction, and the effects of groundwater pumping on the regional water reserves.
- One commenter asked about the depths of the wells needed for the Project.
- A respondent stated that the SEIS should include a jurisdictional delineation for all Waters of the United States (WOUS), including ephemeral drainages, in accordance with the *1987 Corps of Engineers Wetlands Delineation Manual and the December 2006 Arid West Region Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region*.

### ***Issues to be Addressed in the SEIS***

- Where will the water used for construction and operation of the Project be obtained?
- What effect will the Project have on the local water sources?
- What are the depths of the wells needed for the Project?
- Will the Project have any impact on any WOUS?
- How would construction and operation of the Project impact the quality of existing surface water or groundwater?

## WATERSHED RESOURCES

- A commenter stated that the habitat impacted by each alternative should be evaluated and appropriate mitigations made for streambed alterations.

### *Issues to be Addressed in the SEIS*

- What will be the impacts to the existing habitat when streambeds are altered during construction and operation of the Project?

## WILDLIFE RESOURCES

- Commenters stated the Project area is a known habitat for big horn sheep, elk, mule deer, coyotes, and multiple avian species, and requested the SEIS identify impacts the Project will have on these animals.
- One commenter requested that the SEIS analyze the risk to birds, including the golden eagle, by determining collision risks with the PV panels.
- Respondent's stated the SEIS should analyze all direct, indirect, and cumulative impacts to big horn sheep including loss of foraging habitat, impacts to linkage habitat, and loss of connectivity.
- A commenter stated that the SEIS should describe what measures will be taken to protect important wildlife habitat areas and to preserve linkages between them.

### *Issues to be Addressed in the SEIS*

- What is the collision risk of PV panels on the avian population in the Project area?
- What effects will the construction and operation of the Project have on local wildlife populations?

## OTHER

Not all comments received during the scoping period will be addressed in the SEIS. Non-substantive comments expressing general support or disapproval of the proposed Project fall outside of the scope of an EIS, or are otherwise not subject to environmental analysis. Pursuant to NEPA regulations, the scope of an EIS includes the extent of the action, the range of alternatives, and the types of impacts to be evaluated (40 CFR 1508.25). Thus, comments that are not focused on the purpose and need of the proposed action, the proposed alternatives, the assessment of the environmental impacts of those alternatives, and the proposed mitigation are beyond the scope of the SEIS.

## **SUMMARY OF FUTURE STEPS**

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Public and agency scoping is the first phase of public involvement under the NEPA process. The public will have additional opportunities to be involved in the preparation of the SEIS. The next phase of public involvement will involve review and comment on the Draft SEIS. At this time, the BLM anticipates releasing the Draft SEIS for public review by the second quarter of 2012; a minimum of 90 days will be provided for commenting on the Draft SEIS and Proposed RMP Amendment. The public also will have an opportunity to review and comment on the Final SEIS when it is published.

Information about all opportunities for public involvement, including announcements of public meetings and releases of documents for review, will be maintained on the following BLM website: ([http://www.blm.gov/nv/st/en/fo/lvfo/blm\\_programs/energy/Silver\\_State\\_Solar\\_South.html](http://www.blm.gov/nv/st/en/fo/lvfo/blm_programs/energy/Silver_State_Solar_South.html)).

**APPENDIX A**  
**Federal Register Notice of Intent to Prepare an**  
**Environmental Impact Statement**

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identifying information—may be made publicly available at any time. While you can ask in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

The public is also encouraged to help identify any other management questions and concerns that should be addressed in the EIS.

The BLM will use an interdisciplinary approach to develop the plan in order to consider the variety of resource issues and concerns identified. Specialists with expertise in the following disciplines will be involved in the planning process: Range management, wildlife biology, archaeology, riparian, soils, and outdoor recreation.

**Authority:** 40 CFR 1501.7, 43 CFR 1610.2.

**Michael C. Courtney,**  
*Field Manager.*

[FR Doc. 2011-22346 Filed 8-31-11; 8:45 am]

**BILLING CODE 4310-GG-P**

## DEPARTMENT OF THE INTERIOR

### Bureau of Land Management

[LLNVS0100.L51010000.ER0000.  
LVRWF1104100; NVN-085801, NVN-088592,  
NVN-089530, and NVN-090050; MO#  
4500022828; TAS: 14X5017]

#### **Notice of Intent To Prepare a Supplemental Environmental Impact Statement and a Resource Management Plan Amendment, and Notice of Segregation for the Proposed First Solar South Project Near Primm in Clark County, NV**

**AGENCY:** Bureau of Land Management,  
Interior.

**ACTION:** Notice of Intent.

**SUMMARY:** In compliance with the National Environmental Policy Act of 1969, as amended (NEPA), the Bureau of Land Management (BLM), Las Vegas Field Office (LVFO), will prepare a Supplemental Environmental Impact Statement (EIS) and a proposed amendment to the Las Vegas Resource Management Plan (RMP) for a proposed solar energy project located on public lands in Clark County, Nevada. Publication of this notice initiates the scoping process to solicit public comments and identifies issues for both actions. Publication of this notice also serves to segregate the identified lands from appropriation under the public land laws, including location under the Mining Law, but not the Mineral Leasing Act or the Materials Act, subject to valid existing rights.

**DATES:** This notice initiates the public scoping process. Comments on issues may be submitted in writing until October 31, 2011. The date(s) and location(s) of any scoping meetings will be announced at least 15 days in advance through local news media and the BLM Web site at: <http://www.blm.gov/nv/st/en/fo/lvfo.html>. A temporary segregation of the lands identified herein is effective immediately upon publication of this notice in the **Federal Register**.

**ADDRESSES:** Written comments may be submitted by the following methods:

• *E-mail:*

[SilverStateSouthEIS@blm.gov](mailto:SilverStateSouthEIS@blm.gov).

• *Fax:* (702) 515-5010, attention

Gregory Helseth.

• *Mail:* Bureau of Land Management,  
Las Vegas Field Office, Attn: Gregory  
Helseth, 4701 North Torrey Pines Drive,  
Las Vegas, Nevada 89130-2301.

**FOR FURTHER INFORMATION CONTACT:**

Gregory Helseth, Renewable Energy  
Project Manager, at (702) 515-5173; or  
e-mail at [SilverStateSouthEIS@blm.gov](mailto:SilverStateSouthEIS@blm.gov).  
Please also contact Gregory Helseth to  
have your name added to the mailing  
list. Persons who use a  
telecommunications device for the deaf  
(TDD) may call the Federal Information  
Relay Service (FIRS) at 1-800-877-8339  
to contact the above individual during  
normal business hours. The FIRS is  
available 24 hours a day, 7 days a week,  
to leave a message or question with the  
above individual. You will receive a  
reply during normal business hours.

**SUPPLEMENTARY INFORMATION:** Silver  
State Solar, LLC, has submitted a right-  
of-way (ROW) application for the  
construction, operation, maintenance,  
and termination of a solar energy  
generation facility on 13,043 acres of  
public land east of Primm, Nevada. The  
ROW application is assigned BLM case  
number NVN-089530. This application  
expands on ROW application NVN-  
085801. The proposed solar energy  
project would consist of photovoltaic  
panels and related ROW appurtenances,  
including a substation and switchyard  
facilities, and would produce about 400  
megawatts of electricity.

The Supplemental EIS will address  
new information associated with NVN-  
089530 and update as necessary the  
consideration of NVN-085801, which  
was analyzed in the Final EIS for the  
Silver State Solar Energy Project. The  
Record of Decision signed October 12,  
2010 for the Silver State Solar Energy  
Project did not authorize all phases of  
application NVN-085801.

Approval of ROW application NVN-  
089530 will require amendment of the  
October 1998 Las Vegas RMP in order to

address proposed changes in land and  
resource use within the Jean Lake/Roach  
Lake Special Recreation Management  
Area (SRMA). The purpose of the public  
scoping process is to determine relevant  
issues that will influence the scope of  
the environmental analysis, including  
alternatives, and guide the process for  
developing the Supplemental EIS. At  
present, the BLM has identified the  
following preliminary issues: Impacts to  
threatened and endangered species,  
visual resources, recreation and off-  
highway vehicle use; and  
socioeconomic and cumulative impacts.  
The Supplemental EIS will analyze the  
site-specific impacts on air quality,  
biological resources, cultural resources,  
special designations (SRMA), water  
resources, geological resources and  
hazards, hazardous materials handling,  
land and airspace use, noise,  
paleontological resources, public health,  
socioeconomics, soils, traffic and  
transportation, visual resources,  
wilderness characteristics, waste  
management, worker safety, and fire  
protection; as well as facility-design  
engineering, efficiency, reliability,  
transmission-system engineering,  
transmission line safety, and nuisance  
issues.

By this notice, the BLM is complying  
with requirements in 43 CFR 1610.2(c)  
to notify the public of potential  
amendments to land use plans. The  
BLM will integrate the land use  
planning process with the NEPA  
process for this project. The BLM will  
utilize and coordinate the NEPA  
commenting process to satisfy the  
public involvement process for Section  
106 of the National Historic  
Preservation Act (16 U.S.C. 470(f)) as  
provided for in 36 CFR 800.2(d)(3).  
Native American tribal consultations  
will be conducted in accordance with  
policy. Tribal concerns will be given  
due consideration, including impacts on  
Indian trust assets. Federal, State, and  
local agencies, as well as individuals or  
organizations that may be interested in  
or affected by the BLM's decision on  
this project, are invited to participate in  
the scoping process and, if eligible, may  
request or be requested by the BLM to  
participate as a cooperating agency.

Before including your address, phone  
number, e-mail address, or other  
personal identifying information in your  
comment, you should be aware that  
your entire comment—including your  
personal identifying information—may  
be made publicly available at any time.  
While you can ask us in your comment  
to withhold your personal identifying  
information from public review, we  
cannot guarantee that we will be able to  
do so.



*Segregation of Lands:* An Interim Rule, published in the **Federal Register** (76 FR 23198) on April 26, 2011, amended the BLM regulations found in 43 CFR parts 2090 and 2800 to provide provisions to allow the BLM to temporarily segregate from the operation of the public land laws, by publication of a **Federal Register** notice, public lands included in a pending solar energy generation ROW application in order to promote the orderly administration of the public lands. Upon segregation under the Interim Rule, such lands will not be subject to appropriation under the public land laws, including location under the Mining Law of 1872 (but not the Mineral Leasing Act or the Materials Act), subject to valid existing rights, for a period of up to 2 years.

This segregation is warranted to allow for the orderly administration of the public lands to facilitate the development of valuable renewable resources and to avoid conflicts between renewable energy generation and mining claims. This temporary segregation does not affect valid existing rights in mining claims located before this segregation notice. Licenses, permits, cooperative agreements, or discretionary land use authorizations of a temporary nature which would not impact lands identified in this notice may be allowed with the approval of an authorized officer of the BLM during the segregative period.

The lands segregated under this Notice are legally described as follows:

#### Mount Diablo Meridian

T. 26 S., R. 59 E.,  
 Sec. 13, Lots 1 to 8, inclusive;  
 Sec. 14;  
 Sec. 23 E $\frac{1}{2}$ ;  
 Sec. 24, Lots 1 to 16, inclusive;  
 Secs. 25 and 26;  
 Sec. 27, SE $\frac{1}{4}$ ;  
 Sec. 34, Lot 1, E $\frac{1}{2}$ , portion of all public lands east of ROW CC0360 Union Pacific Railroad;  
 Secs. 35 and 36.  
 T. 27 S., R. 59 E.,  
 Sec. 1, Lots 1 to 4, inclusive, S $\frac{1}{2}$ NE $\frac{1}{4}$ , S $\frac{1}{2}$ NW $\frac{1}{4}$ , and S $\frac{1}{2}$ ;  
 Sec. 2, Lots 1 to 4, inclusive, S $\frac{1}{2}$ NE $\frac{1}{4}$ , S $\frac{1}{2}$ NW $\frac{1}{4}$ , and S $\frac{1}{2}$ ;  
 Sec. 3, Lot 1, Lot 2, Lot 3, Lot 4, NE $\frac{1}{4}$ SE $\frac{1}{4}$ NE $\frac{1}{4}$ , SE $\frac{1}{4}$ SE $\frac{1}{4}$ NE $\frac{1}{4}$ , NE $\frac{1}{4}$ NE $\frac{1}{4}$ SE $\frac{1}{4}$ , SE $\frac{1}{4}$ NE $\frac{1}{4}$ SE $\frac{1}{4}$ , and SE $\frac{1}{4}$ SE $\frac{1}{4}$ SE $\frac{1}{4}$ ;  
 Sec. 9, NE $\frac{1}{4}$ SE $\frac{1}{4}$ , SW $\frac{1}{4}$ SE $\frac{1}{4}$ , SE $\frac{1}{4}$ SW $\frac{1}{4}$ SE $\frac{1}{4}$ , NE $\frac{1}{4}$ SW $\frac{1}{4}$ SE $\frac{1}{4}$ , SE $\frac{1}{4}$ NW $\frac{1}{4}$ SE $\frac{1}{4}$ , and NE $\frac{1}{4}$ NW $\frac{1}{4}$ SE $\frac{1}{4}$ , portion of public lands east of ROW CC0360 Union Pacific Railroad;  
 Sec. 10, SE $\frac{1}{4}$ NE $\frac{1}{4}$ , N $\frac{1}{2}$ NE $\frac{1}{4}$ , and S $\frac{1}{2}$ ;  
 Secs. 11 to 15, inclusive;  
 Sec. 22, Lots 2 to 13, inclusive, SW $\frac{1}{4}$ NE $\frac{1}{4}$ , SE $\frac{1}{4}$ NW $\frac{1}{4}$ , and NW $\frac{1}{4}$ SW $\frac{1}{4}$ ;  
 Secs. 23 and 24;

Sec. 25, N $\frac{1}{2}$ ;  
 Sec. 26, Lots 2 to 13, inclusive, SW $\frac{1}{4}$ NE $\frac{1}{4}$ , SE $\frac{1}{4}$ NW $\frac{1}{4}$ , and NW $\frac{1}{4}$ SW $\frac{1}{4}$ ;  
 Sec. 27, Lots 4 to 6, inclusive.  
 The area described contains 13,043.20 acres, more or less, in Clark County, Nevada.

The BLM intends to resurvey T. 27 S., R. 59 E., sec. 3, lots 1 through 3. The description will be replaced for those lands upon final approval of the official plat of survey. The segregation of lands identified in this notice will not exceed 2 years from the date of publication. Termination of the segregation, as provided in the Interim Rule, is the date that is the earliest of the following: Upon issuance of a decision by the authorized officer granting, granting with modifications, or denying the application for a ROW; automatically at the end of the 2 year segregation; or upon publication of a **Federal Register** notice of termination of the segregation. Upon termination of segregation of these lands, all lands subject to this segregation will automatically reopen to appropriation under the public land laws.

**Authority:** 43 CFR 2800 and 2090.

**Robert B. Ross Jr.,**

*Las Vegas Field Office Manager.*

[FR Doc. 2011-22345 Filed 8-31-11; 8:45 am]

**BILLING CODE 4310-HC-P**

## DEPARTMENT OF THE INTERIOR

### Bureau of Land Management

[LLMT922200-11-L13100000-FI0000-P;MTM 98742]

#### Notice of Proposed Reinstatement of Terminated Oil and Gas Lease MTM 98742

**AGENCY:** Bureau of Land Management, Interior.

**ACTION:** Notice.

**SUMMARY:** Per 30 U.S.C. 188(d), Wilks Ranch Montana, Ltd. timely filed a petition for reinstatement of competitive oil and gas lease MTM 98742, Fergus County, Montana. The lessee paid the required rental accruing from the date of termination.

No leases were issued that affect these lands. The lessee agrees to new lease terms for rentals and royalties of \$20 per acre and 18-2/3 percent. The lessee paid the \$500 administration fee for the reinstatement of the lease and the \$163 cost for publishing this Notice.

The lessee met the requirements for reinstatement of the lease per Sec. 31 (d) and (e) of the Mineral Leasing Act of 1920 (30 U.S.C. 188). We are proposing

to reinstate the lease, effective the date of termination subject to the:

- Original terms and conditions of the lease;
  - Increased rental of \$20 per acre;
  - Increased royalty of 18 $\frac{2}{3}$  percent;
- and
- \$163 cost of publishing this Notice.

**FOR FURTHER INFORMATION CONTACT:** Teri Bakken, Chief, Fluids Adjudication Section, Bureau of Land Management Montana State Office, 5001 Southgate Drive, Billings, Montana 59101-4669, 406-896-5091, [Teri\\_Bakken@blm.gov](mailto:Teri_Bakken@blm.gov).

Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

**Teri Bakken,**

*Chief, Fluids Adjudication Section.*

[FR Doc. 2011-22352 Filed 8-31-11; 8:45 am]

**BILLING CODE 4310-DN-P**

## DEPARTMENT OF THE INTERIOR

### Bureau of Land Management

[LLOR936000-L14300000-ET0000; HAG-11-0232; OROR-45928]

#### Public Land Order No. 7777; Partial Extension of Public Land Order No. 6874; Oregon

**AGENCY:** Bureau of Land Management, Interior.

**ACTION:** Public Land Order.

**SUMMARY:** This order extends, in part, the duration of the withdrawal created by Public Land Order No. 6874 for an additional 20-year period. The extension is necessary to continue protection of the unique and important forest genetic resources and the expenditure of Federal funds at the Forest Service's Panelli Seed Orchard, which would otherwise expire on August 27, 2011. The withdrawal for the Quartz Evaluation Plantation is no longer needed and that portion of the withdrawal will expire at the end of the original term on August 27, 2011.

**DATES:** *Effective Date:* August 28, 2011.

**FOR FURTHER INFORMATION CONTACT:** Charles R. Roy, Bureau of Land Management, Oregon/Washington State Office, 503-808-6189, or Dianne Torpin, United States Forest Service, Pacific Northwest Region, 503-808-2422. Persons who use a telecommunications device for the deaf

## **APPENDIX B**

### **BLM Media Releases and List of Recipients**

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**Release Date:** 09/01/11  
**Contacts:** Hillerie C. Patton, 702-515-5046, [hillerie\\_c\\_patton@blm.gov](mailto:hillerie_c_patton@blm.gov)

**BLM Opens Scoping for Proposed First Solar South Project Near Primm**

Las Vegas –The Bureau of Land Management (BLM) Las Vegas Field Office is initiating a 60-day scoping period to solicit public comments, to identify issues and concerns that should be analyzed in the development of a supplemental environmental impact statement (SEIS), for a proposed solar energy project east of Primm, Nev. The proposal includes 13,043 acres of Federal land managed by the BLM. The scoping period will close October 31.

In addition to the SEIS, the Las Vegas Field Office will prepare a proposed amendment to the Las Vegas Resource Management Plan (LVRMP). Publication of the notice in the September 1 *Federal Register* initiates the scoping process to identify issues. Scoping meetings will be announced at least 15 days in advance through local media and on the BLM website at [www.blm.gov/nv](http://www.blm.gov/nv).

On publication of the notice, the lands identified for the proposal are temporarily closed to location under the Mining Law, but not the Mineral Leasing Act or the Materials Act, subject to valid existing rights for up to two years.

The public is being asked to identify issues associated with the First Solar proposal to construct photovoltaic panels, and related right-of-way appurtenances, including a substation and switchyard facilities. The proposed project would produce approximately 400 megawatts of electricity. The scoping comments will be used to develop a draft environmental impact statement and draft proposed plan amendment.

Only written comments will be accepted and may be mailed to the BLM, Southern Nevada District, Renewable Energy Project Manager, 4701 N. Torrey Pines Drive, Las Vegas, NV 89130, or emailed to [SilverStateSouthEIS@blm.gov](mailto:SilverStateSouthEIS@blm.gov). Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

For more information, please call Greg Helseth at 702-515-5173.

The BLM manages more land - over 245 million acres - than any other Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western states, including Alaska. The Bureau, with a budget of about \$1 billion, also administers 700 million acres of sub-surface mineral estate throughout the nation. The BLM's multiple-use mission is to sustain the health and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other resources on public lands.

--BLM--

Las Vegas Field Office   4701 N. Torrey Pines Drive   Las Vegas, NV 89032

## ***BLM Nevada News***

Southern Nevada District Office

FOR IMMEDIATE RELEASE: [INSERT DATE], 2011

Contact: Hillerie Patton, 702-515-5046, [hillerie\\_c\\_patton@blm.gov](mailto:hillerie_c_patton@blm.gov)

### **BLM Seeks Comments for First Solar South Project Near Primm**

Las Vegas –The Bureau of Land Management (BLM) Las Vegas Field Office is seeking comments on solar energy project proposed just east of Primm, Nev. The project would be built on approximately 13,043 acres of Federal land managed by the BLM. A Notice of Intent to Prepare an Environmental Impact Statement, published in the [INSERT DATE] *Federal Register*.

The Las Vegas Field Office will prepare a supplemental environmental impact statement (SEIS) for the project, and prepare a proposed amendment to the Las Vegas Resource Management Plan (LVRMP). Publication of the notice in the *Federal Register* initiates the beginning of the scoping process to identify issues. Scoping meetings will be announced at least 15 days in advance through local media and on the BLM website at [www.blm.gov/nv](http://www.blm.gov/nv).

The public is being asked to comment on the First Solar proposal to construct photovoltaic panels, and related right-of-way appurtenances, including a substation and switchyard facilities. The proposed project would produce approximately 400 megawatts of electricity.

Written comments may be mailed to the BLM, Southern Nevada District, Renewable Energy Project Manager, 4701 N. Torrey Pines Drive, Las Vegas, NV 89130, or emailed to [SilverStateSouthEIS@blm.gov](mailto:SilverStateSouthEIS@blm.gov). For more information, please call Greg Helseth at 702-515-5173.

-BLM-

Below is a list of media contacts that were sent a release regarding the Silver State Solar South scoping meeting information:

[5newsdesk@kvvu.com](mailto:5newsdesk@kvvu.com);  
[AAbelCarrolA@globepoint.net](mailto:AAbelCarrolA@globepoint.net);  
[ademeo@co.nye.nv.us](mailto:ademeo@co.nye.nv.us);  
[admin@mesquitelocalnews.com](mailto:admin@mesquitelocalnews.com);  
[aguilac@co.clark.nv.us](mailto:aguilac@co.clark.nv.us);  
[aplanas@reviewjournal.com](mailto:aplanas@reviewjournal.com);  
[aplasvegas@ap.org](mailto:aplasvegas@ap.org);  
[BHaynes@reviewjournal.com](mailto:BHaynes@reviewjournal.com);  
[castle@lnett.com](mailto:castle@lnett.com);  
[citydesk@reviewjournal.com](mailto:citydesk@reviewjournal.com);  
[coachalan@gmail.com](mailto:coachalan@gmail.com);  
[cpolson@cbs.com](mailto:cpolson@cbs.com);  
[daniel\\_balduini@fws.gov](mailto:daniel_balduini@fws.gov);  
[dbly@dvtv.com](mailto:dbly@dvtv.com);  
[desert-flyer@earthlink.net](mailto:desert-flyer@earthlink.net);  
[desk@ktnv.com](mailto:desk@ktnv.com);  
[DHam@reviewjournal.com1](mailto:DHam@reviewjournal.com1);  
[dkihara@reviewjournal.com](mailto:dkihara@reviewjournal.com);  
[editor@hbc.lvcoxmail.com](mailto:editor@hbc.lvcoxmail.com);  
[efoster@agri.state.nv.us1](mailto:efoster@agri.state.nv.us1);  
[eileen@becnv.com](mailto:eileen@becnv.com);  
[darren\\_emery@metronetworks.com](mailto:darren_emery@metronetworks.com);  
[EPAPPA@co.clark.nv.us](mailto:EPAPPA@co.clark.nv.us);  
[eruttan@cox.net](mailto:eruttan@cox.net);  
[etl@lvvj.com](mailto:etl@lvvj.com);  
[fmccabe@reviewjournal.com](mailto:fmccabe@reviewjournal.com)

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## **APPENDIX C**

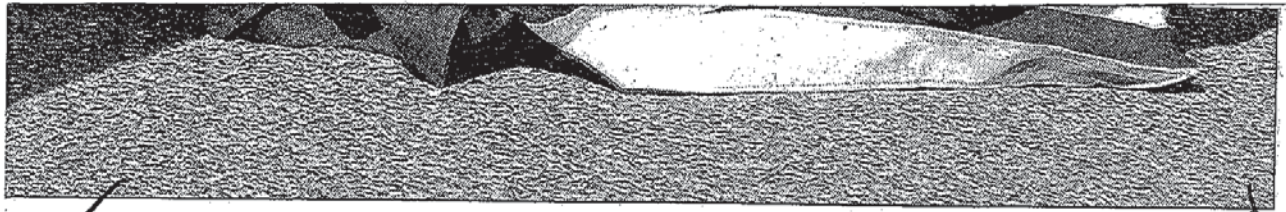
### **Published Newspaper Releases and Affidavits**

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## SILVER STATE SOUTH SOLAR PROJECT PUBLIC MEETING ANNOUNCEMENT

The Bureau of Land Management (BLM) is holding public scoping meetings to receive comments on a proposed solar energy project near the Nevada-California border in Clark County, NV. Please plan to attend one of the following open house meetings:

### PRIMM

Tuesday, September 27, 2011

6 pm – 8 pm

Primm Valley Golf Club, 1 Yates Well Road, Nipton, CA 92364

### LAS VEGAS

Wednesday, September 28, 2011

6 pm – 8 pm

Courtyard Marriott, 5845 Dean Martin Drive, Las Vegas, NV 89118

### JEAN

Thursday, September 29, 2011

6 pm – 8 pm

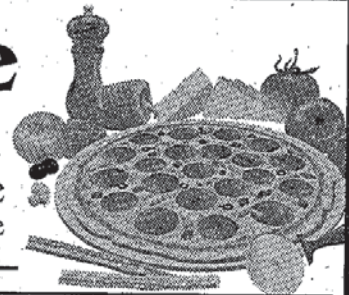
Jean Airport, 23600 Las Vegas Blvd. South, Jean, NV 89019

For questions on this project please contact Greg Helseth, BLM Project Manager, at (702) 515-5173 or email [ghelseth@blm.gov](mailto:ghelseth@blm.gov).

## K7 Pizza & Lounge

(775) 727-9070

At the corner of Hafen Ranch Rd. & Thousandaire  
Hwy. 160 to Manse Rd, exit. Left on Hafen Ranch Rd. – 1 mile to site



### Introducing East Indian Meals

- Chicken Kurma w/Garlic Naan & Basmati Rice
- Chicken Tikka Masala w/Garlic Naan & Basmati Rice
- Yellow Madras Chicken Curry w/Naan & Basmati Rice

Deep Dish Pizzas • Calzones  
Dessert Pizzas • Pastas  
Cold & Hot Sandwiches  
Burgers • Italian • American  
East Indian Meals  
& Appetizers

### DINE IN SPECIALS

Choose any one of  
our Supreme or  
Deluxe Pizzas for only



## SILVER STATE SOUTH SOLAR PROJECT PUBLIC MEETING ANNOUNCEMENT

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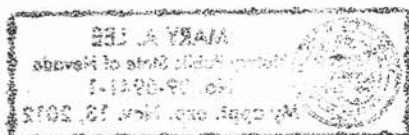
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Thursday, September 29, 2011

6 pm – 8 pm

Jean Airport, 23600 Las Vegas Blvd. South, Jean, NV 89019

For questions on this project please contact Greg Helseth,  
BLM Project Manager, at (702) 515-5173 or email [ghelseth@blm.gov](mailto:ghelseth@blm.gov).





## **PAHRUMP VALLEY TIMES PROOF OF PUBLICATION**

---

I, Stacey M. Lewis, hereby swear and depose

that the attached advertisement

Was published for

**STRATEGIC SOLUTIONS**

In the Las Vegas Review Journal a Daily News

Paper, on the following date(s):

**09/14/2011**

Verified this 15<sup>TH</sup> day of September, 2011 by

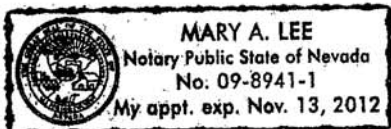
/s/ Stacey M. Lewis

Stacey M. Lewis

Legal Bookkeeper

/s/ Mary Lee

Notary Public



AFFP DISTRICT COURT  
Clark County, Nevada

AFFIDAVIT OF PUBLICATION

STATE OF NEVADA)  
COUNTY OF CLARK) SS:

Stacey M. Lewis, being 1st duly sworn, deposes and says: That she is the Legal Clerk for the Las Vegas Review-Journal and the Las Vegas Sun, daily newspapers regularly issued, published and circulated in the City of Las Vegas, County of Clark, State of Nevada, and that the advertisement, a true copy attached for,

STRATEGIC SOLUTIONS

8892840STR

7439382

was continuously published in said Las Vegas Review-Journal and / or Las Vegas Sun in 3 edition(s) of said newspaper issued from 09/12/2011 to 09/14/2011, on the following days:

09/12/2011

09/13/2011

09/14/2011

Signed: \_\_\_\_\_

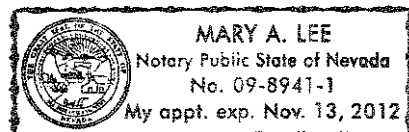
*Stacey M. Lewis*

SUBSCRIBED AND SWORN BEFORE ME THIS, THE

14<sup>th</sup> day of September, 2011.

Notary Public

*Mary Lee*



**APPENDIX D**  
**Direct Mail of Postal Notices and Affidavits**

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## SILVER STATE SOUTH SOLAR PROJECT PUBLIC MEETING ANNOUNCEMENT

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For questions on this project please contact Greg Helseth, BLM Project Manager, at (702) 515-5173 or email [ghelseth@blm.gov](mailto:ghelseth@blm.gov)



**Postage Statement -- First-Class Mail**

Transaction Number: 201125019055029 M0		CAPS Transaction Number:		Postage Statement Number: 119429220	
Mailing Group	Mailing Group ID 98977994			Mailing Job Number	
	Preparer [REDACTED]			Open Date 09-07-2011	
	Job Description			Close Date 09-07-2011	
Mailer	Permit Holder's Name and Address and Email Address, If Any [REDACTED] CAPS Customer Ref. No: 2402768 Stratgic Solutions CRID: 2402768		Name and Address of Mailing Agent (If other than permit holder) [REDACTED] CRID: 2402768		Name and Address of Individual or Organization for Which Mailing is Prepared (If other than permit holder)
Mailing	Post Office of Mailing LAS VEGAS NV 89199-9998	Processing Category Cards	Parcels Only Hold For Pickup (HFPU): No. of Pieces 0	Mailer's Mailing Date 09/07/11	Federal Agency Cost Code
	Type of Postage Permit Imprint			Weight of a Single Piece 0.0059 lbs.	Statement Seq. No. 115923
	Permit # 781	For Mail Enclosed Within Another Class [ ]Standard Mail [ ]Bound Printed Matter [ ]Library Mail [ ]Media Mail [ ]Periodicals [ ]Parcel Post			Total Pieces 1,071
	For Automation Rate Pieces, Enter Date of Address Matching and Coding 09/07/11			Move Update Method: NCOALink	Total Weight 6.1047 lbs.
Postage	Letter or flat-sized mailpieces contain: [ ]Reply card or reply envelope [ ]Only contents that are not required to be mailed FCM [ ]DVD/CD or other disk [ ]Round Trip Only: 1 DVD/CD or other disk			Parts Completed <b>A, B</b>	
				Subtotal Postage (Add parts totals) \$227.99	
	Complete if the mailing includes pieces bearing metered or precanceled stamps. Rate at Which Postage Affixed (Check one) [ ]Correct [ ]Lowest [ ]Neither				
	Incentive/Fee (% or \$0.00) ___ x Total Postage or Pieces as applicable ___				
	Net Postage Due			\$227.99	
	For USPS Use Only: Additional Postage Payment (State reason)			Total USPS Adjusted Postage	
Certification	Incentive Claimed: _____				
	<p>The mailer certifies acceptance of liability for and agreement to pay any revenue deficiencies assessed on this mailing, subject to appeal. If an agent certifies that he or she is authorized on behalf of the mailer then that mailer is bound by the certification and agrees to pay any deficiencies. In addition, agents may be liable for any deficiencies resulting from matters within their responsibility, knowledge, or control. The mailer hereby certifies that all information furnished on this form is accurate, truthful, and complete; that the mail and the supporting documentation comply with all postal standards and the mailing qualifies for the prices and fees claimed; and that the mailing does not contain any matter prohibited by law or postal regulation. I understand that anyone who furnishes false or misleading information on this form or who omits information requested on this form may be subject to criminal and/or civil penalties, including fines and imprisonment.</p> <p>Privacy Notice: For information regarding our Privacy Policy visit <a href="http://www.usps.com">www.usps.com</a></p>				

Part A

Automation Prices

Cards		Price	No. of Pieces	Total Postage
A1	5-Digit	\$0.208		\$
A3	AADC	\$0.223		
A4	Mixed AADC	\$0.235		

Part A Total

Part B

Nonautomation Prices

Cards		Price	No. of Pieces	Total Postage
B2	Single-Piece	\$0.290		

Part B Total

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**APPENDIX E**  
**Public Scoping Meeting Sign-in Sheets**

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## SOLAR ENERGY PROJECT

September 2011

PLEASE SIGN IN

DATE: \_\_\_\_\_

[illegible]

Copies of this sign in form may become part of the public record associated with this proposed project. Individuals requesting that their name and address be withheld from public review or from disclosure under the Freedom of Information Act must check "Yes" in the personal information column. Such requests will be honored to the extent allowed by law.



Bureau of Land Management (BLM) Las Vegas Field Office/Nevada



## SILVER STATE SOUTH

SOLAR ENERGY PROJECT

September 2011

PLEASE SIGN IN

DATE: 28 September 2011

Name	Organization/Affiliation	Mailing Address	Phone Number	Email	Do you want your information withheld from the public record?	Would you like to be on the mailing list for project updates?
MICHAEL UHL	DADEM CLARK COUNTY	500 S. GRAND CENTRAL LV NV	455-1628	UHL@CLARKCOUNTY.NV.GOV	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
CHARLES MORGAN		1028 NEIL ARMSTRONG CIR. LV, NV 89145			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Eddie	Jim	P.O. Box 1503 Rahmump Nevada 89041			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maria Kaseko	Clark County			mkaseko@clarkcounty.nv.gov	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Ben Graham					<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Judy Bundart		1800 Sterling Point Ct Henderson NV 89012		j.bundart@cox.net	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Wayne Bundart					<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Vinny Spottleson	Sierra Club	708 S. 6th Street, Las Vegas, NV 89101	(702) 285-6588	vinny.spottleson@sierraclub.org	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
BRAD SQUERCH	FIRST SOLAR				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
ELLEN ROSS		214 E. SHELBORNE LV NV 89123			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
TOM DRIGGS	SANTORO, DRIGGS WALCH	400 S. 4th St. 3rd FL LV NV	702 791-0308	tdriggs@nevadafirm.com	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Tucker Field	Clark County Dept. of Aviation		702-261-3130	tuckerf@ccclarkcounty.nv.gov	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
ANGELA MACKINNON	MWH	3010 W. CHARLESTON BLVD, LV, NV 89102	702-821-4344	angela.i.mackinnon@mwhglobal.com	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
BOB SWADKINS	PRIMM				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
JOAN HART	RRAS	8180 PLACID ST. L.V. 89123	702-361-1171	jhart@env.net	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Hester Hart		8180 Placid LV 89123			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
R.J. Johnson		948 Koss Dr. Boulder City, NV 89005	702-293-5273	rjohnson@aol.com	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Tiffany East		6600 Amelia Earhart Pt. #A LV 89119	256 0045	teast@thelegion.com	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Edgar Dopena		504 E Rally St Henderson, NV 89011			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Mary Zavala	BLM	5225 Saranac Rd, Las Vegas NV 89130			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Bill Schmenber		1215 E. ELDOKADO LV NV 89123			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Copies of this sign in form may become part of the public record associated with this proposed project. Individuals requesting that their name and address be withheld from public review or from disclosure under the Freedom of Information Act must check "Yes" in the personal information column. Such requests will be honored to the extent allowed by law.



Bureau of Land Management (BLM) Las Vegas Field Office/Nevada



## SILVER STATE SOUTH

SOLAR ENERGY PROJECT

September 2011

PLEASE SIGN IN

DATE: 28 Sept 2011

Name	Organization/Affiliation	Mailing Address	Phone Number	Email	Do you want your information withheld from the public record?	Would you like to be on the mailing list for project updates?
Jennifer Davis	MWH	3010 W. Charleston	Las Vegas, NV 89102	702-821-4341	Jennifer.L.Davis@mwhglobal.com	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
KEN Freeman	SIVORE	3150 Pon De Rosa	Las Vegas NV 89118	736 0355	Shae1600rey@aol.ca	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
JANE FELDMAN	Sierra Club				feldman-jane@gmail.com	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Rob M Rowka	CBP	4261 Hill Glen Ct NW	WV 26032	774 2000	Blaug@WV.DIVERSITY.ORG	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Cindy Meakra						<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
Rick Lyatt	American Adventure Tours	4045 So Buffalo Ste A107	LV NV 89147	702-876-4600	rick@americanadventuretours.com	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Alisa Williams	American Adventure Tours	4045 So Buffalo Ste A107	LV NV 89147	702-876-4600	alisa@americanadventuretours.com	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Cynthia Lynch		P.O. Box 25	Primm NV 89041			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Ruby Jim		6537 Pepperidge Way	Las Vegas, NV 89108	702-396-4907		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
						<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
						<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
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						<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
						<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No

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Bureau of Land Management (BLM) Las Vegas Field Office/Nevada



## SOLAR ENERGY PROJECT

### Scoping Meeting Sign in Form

September 2011

PLEASE SIGN IN

DATE: \_\_\_\_\_

[illegible]

Copies of this sign in form may become part of the public record associated with this proposed project. Individuals requesting that their name and address be withheld from public review or from disclosure under the Freedom of Information Act must check "Yes" in the personal information column. Such requests will be honored to the extent allowed by law.



Bureau of Land Management (BLM) Las Vegas Field Office/Nevada

## **APPENDIX F**

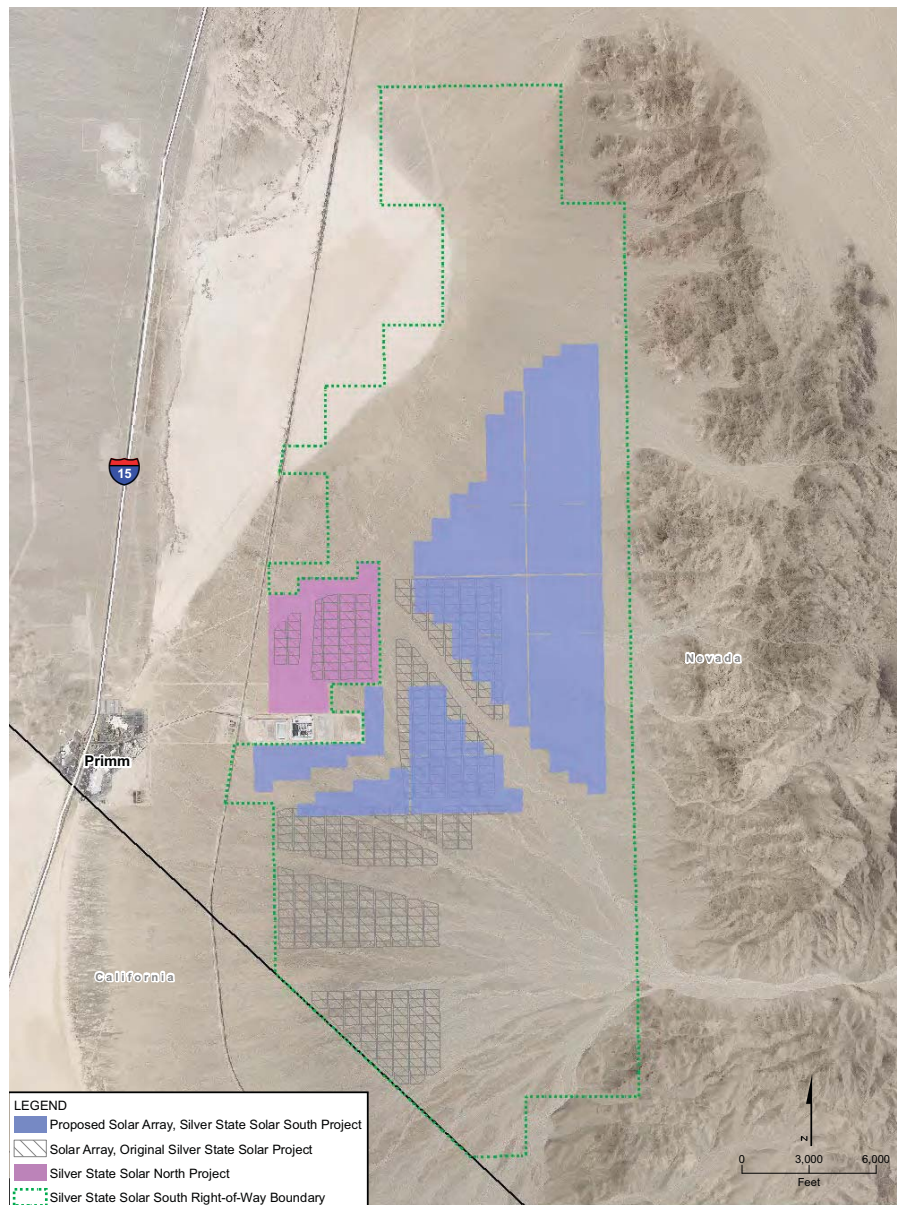
### **Public Scoping Display Boards, Comment Form, and Fact Sheets**

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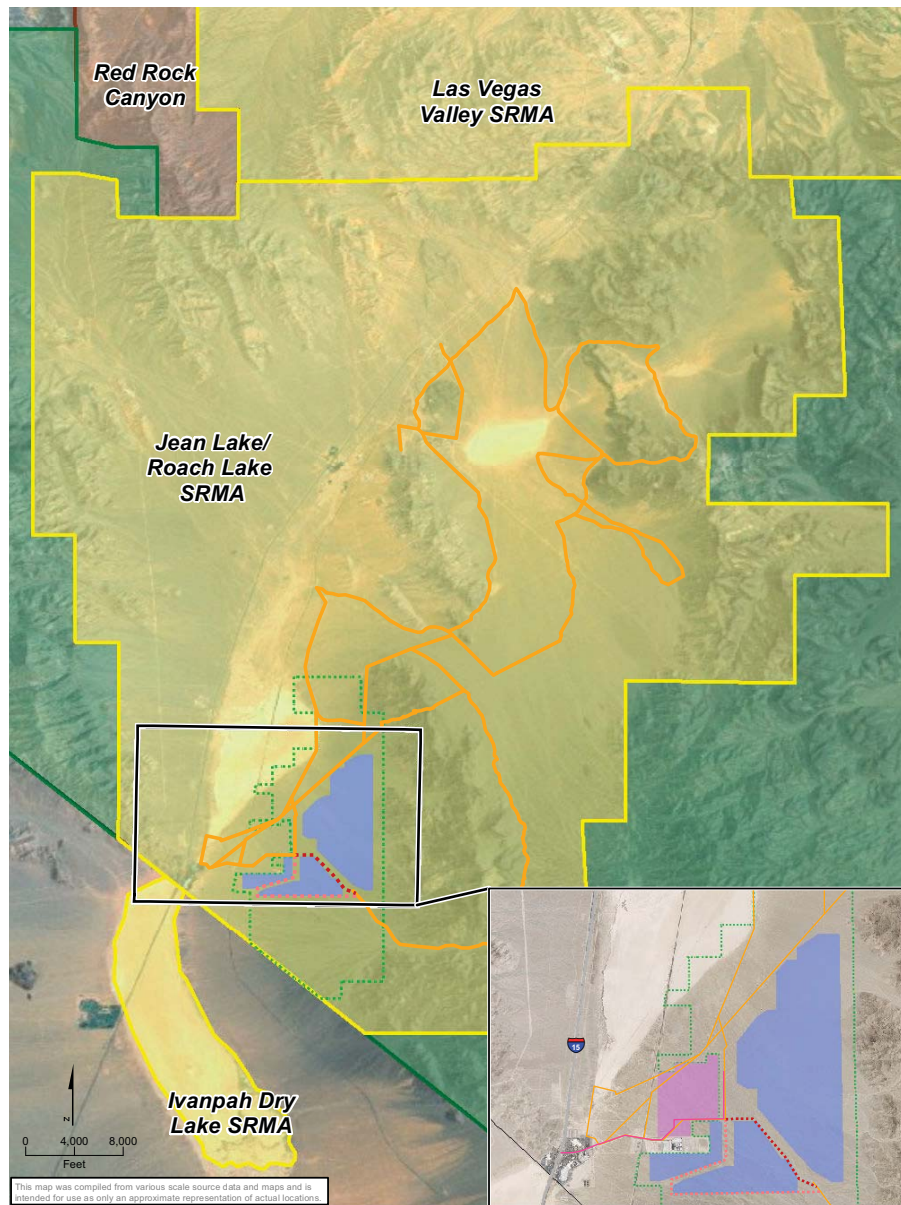
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# Silver State South Site Location





# Silver State South Roads & Trails



# First Solar Series 3 Module

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- No water use associated with power generation
- No air emissions associated with power generation
- Passive technology supports responsible land stewardship
- Requires minimal ongoing maintenance
- Allows for early re-growth
- Minimal visual impact – panel height approximately 8 feet
- High efficiency
  - Reduces amount of land required
- Prefunded module take-back and recycling



# Reasons for Supplemental Environmental Impact Statement (SEIS)

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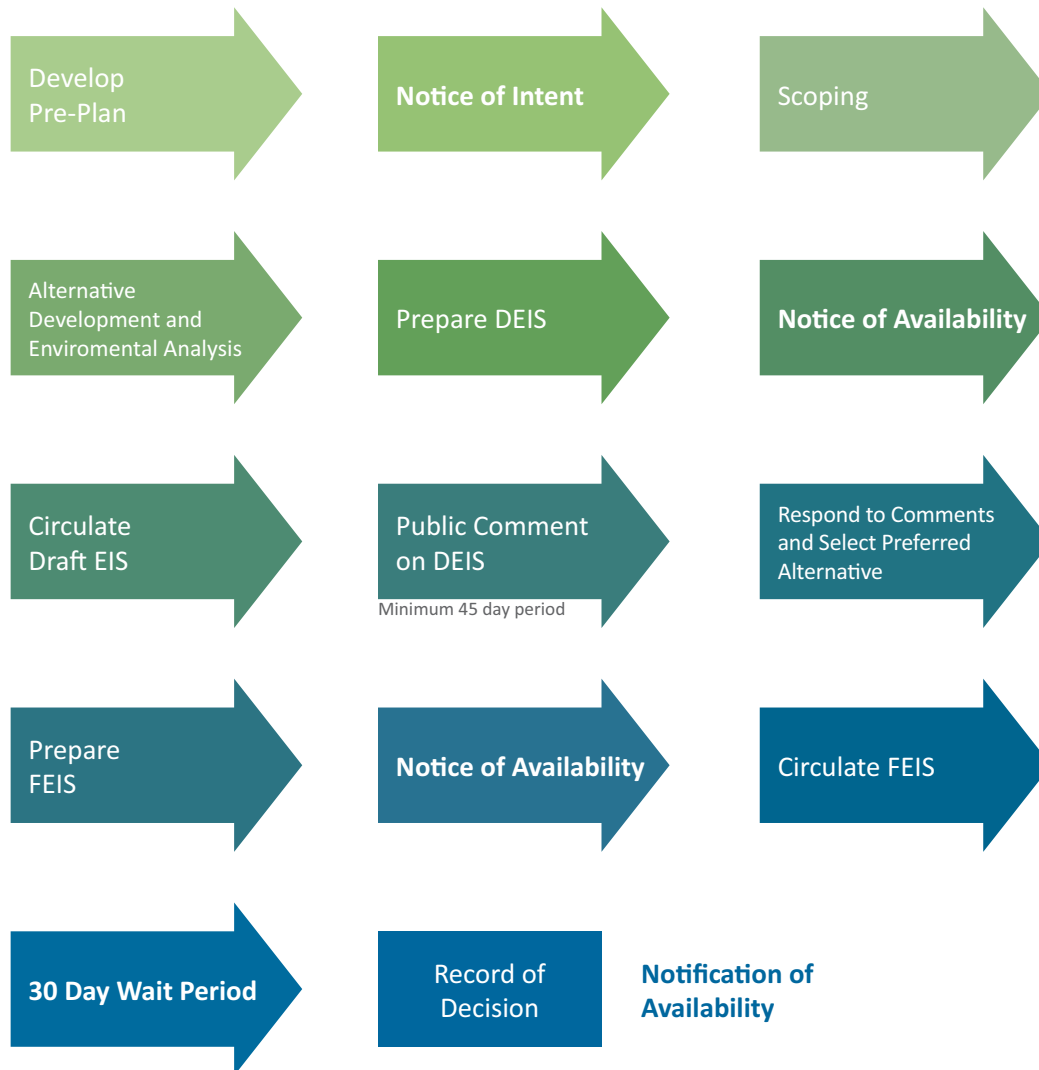


- The BLM considered the Silver State North and Silver State South projects in a single Environmental Impact Statement (EIS).
- The September 12, 2010 Record of Decision (ROD) only authorized Silver State North to proceed, recognizing the need for additional evaluation of Silver State South.
- Since the issuance of the ROD, First Solar has redesigned Silver State South to reduce environmental impacts and address other stakeholder concerns.
- On September 1, 2011, the BLM published a Notice of Intent to supplement the EIS for Silver State South in order to analyze the impacts of the redesigned project.
- The supplemental EIS will analyze impacts associated with the new lands under consideration and, only as necessary, update analysis in the original EIS.



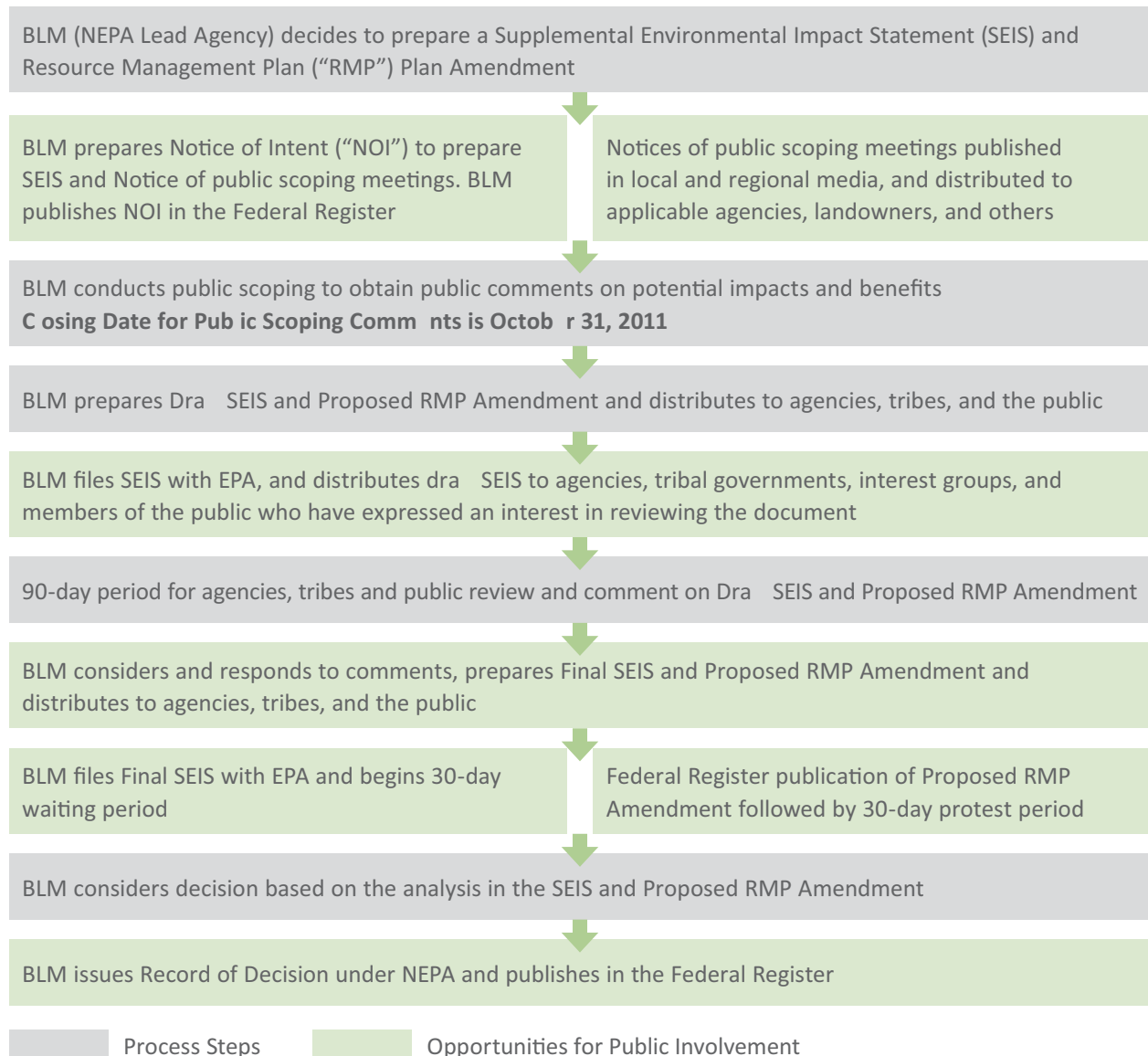
# National Environmental Policy Act Environmental Impact Statement Process

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# National Environmental Policy Act Process





**View from:** I-15 Approx. 1.6 miles North of start of North bound Primm onramp looking South East  
**Conceptual image - subject to final engineering**



**First Solar**  
Silver State South  
Solar Farm

**View from:**  
I-15 Approx. 1.6 miles North  
of start of North bound Primm  
onramp looking South East



**Based on known local data coordinates:**

Latitude	32.837
Longitude	-115.984
Elevation of proposed Project (ft)	3085
Height of Solar Array Structure (ft)	8.4
Date of Photograph	14 September 2011 at 10:00am
Orientation of View	SE
Horizontal Field of View	13.0°
Vertical Field of View	8.0°

**Conceptual image -**  
**subject to final engineering.**

Photomontage Created using  
"TrueScape" Technology

**TRUESCAPE**  
www.truescape.com

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Bureau of Land Management Draft EIS  
**SILVER STATE SOUTH**  
Solar Energy Project



**Scoping Comment Form**

Bureau of Land Management, Las Vegas Field Office/Nevada

At this early state in the planning process, the Bureau of Land Management (BLM) is holding scoping meetings to help identify the range, or scope, of issues related to the Silver State South Solar Energy Project. The issues identified by the public during the scoping process will be considered and addressed during preparation of the environmental impact statement. Please take a few minutes to answer the questions below and return this sheet as addressed on the other side. Comments would be most helpful if received on or before the scoping period closing date of October 31, 2011.

**Please provide your current mailing address and/or any additional names and addresses you think should be included on our mailing list.**

Meeting Location: \_\_\_\_\_

Your Name: \_\_\_\_\_ Name: \_\_\_\_\_

Address: \_\_\_\_\_ Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_ City/State/Zip: \_\_\_\_\_

Email: \_\_\_\_\_ Email: \_\_\_\_\_

**Please check all that apply:**

- ☐ Add my name to the mailing list for this project  
☐ Do not include my name on the mailing list  
☐ Withhold my name/address to extent allowed by law (only for persons not representing organizations)\*

\*All comments received by BLM become part of the public record associated with this proposed project. Accordingly, your comments (including name and address) will be available for review by any person that wishes to review the record. At your request, we will withhold your name and address to the extent allowed by the Freedom of Information Act or any other law.

1. Please describe any issues or concerns that should be addressed in the environmental impact statement.

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[illegible]

Fold, tape top of form, and mail your comments to the address below:

**Greg Helseth**  
BLM Project Manager  
BLM Las Vegas Field Office  
4701 N. Torrey Pines Dr.  
Las Vegas, NV 89130

Place  
Stamp  
Here

# Bureau of Land Management Supplemental EIS

## SILVER STATE SOLAR POWER SOUTH

### Photovoltaic Solar Energy Project

September 2011

Las Vegas Field Office/Nevada

BLM

## INTRODUCTION

The Bureau of Land Management (BLM) is preparing a Supplemental Environmental Impact Study (SEIS) for the proposed Silver State South Solar Energy Project (Silver State South Project). Silver State Solar Power South, LLC, a subsidiary of First Solar Development, Inc. has submitted an application for the construction, operation, and maintenance of a solar energy generation site on public lands adjacent to the town of Primm, Nevada (north of the California/Nevada border). The first step in the SEIS process is public scoping to identify issues and concerns that should be addressed in the SEIS. The 60-day public scoping period for the Silver State South Project ends on October 31, 2011.



## PROJECT DESCRIPTION

First Solar Development, Inc. is proposing to develop an approximately 350 megawatt (MW) solar energy facility on public lands. The application specifies that the photovoltaic solar power plant facility would be located north of the Nevada/California border on approximately 2,900 acres of public lands within a right-of-way grant application area of 13,043 acres.

The facility would have the capacity to generate enough electricity to power over 110,000 households. This assumes an average California household use of approximately 7,000 kilowatt hours per year.

The proposed project would require the construction of a 350 MW photovoltaic solar generating facility with associated facilities including a substation, generation tie line, interconnection facilities, and an operation and maintenance building.

The exact areas of each component are subject to change as the project design develops and the SEIS process proceeds.



## THE EIS PROCESS

The proposed facilities would be on public land managed by the BLM; therefore, approval of the project is considered a Federal action requiring review under and compliance with the National Environmental Policy Act of 1969 (NEPA). Under NEPA, BLM must consider the potential effects of the Silver State South Project on the environment including human, natural, and cultural resources.

### Human

**Environment-** land use, social and economic conditions, environmental justice, visual characteristics, and noise

### Natural

**Environment-** air, geology, soils, water, vegetation, wildlife, special status, and avian species

### Cultural

**Environment-** prehistoric and historic archaeological sites, and traditional cultural lifeways, and resources





# Bureau of Land Management Supplemental EIS

## SILVER STATE SOLAR POWER SOUTH

### Photovoltaic Solar Energy Project

September 2011

BLM  
Las Vegas Field Office/Nevada

#### INTRODUCTION

The Bureau of Land Management (BLM) is preparing a Supplemental Environmental Impact Study (SEIS) for the proposed Silver State South Solar Energy Project (Silver State South Project). Silver State Solar Power South, LLC, a subsidiary of First Solar Development, Inc. has submitted an application for the construction, operation, and maintenance of a solar energy generation site on public lands adjacent to the town of Primm, Nevada (north of the California/Nevada border). The first step in the SEIS process is public scoping to identify issues and concerns that should be addressed in the SEIS. The 60-day public scoping period for the Silver State South Project ends on October 31, 2011.



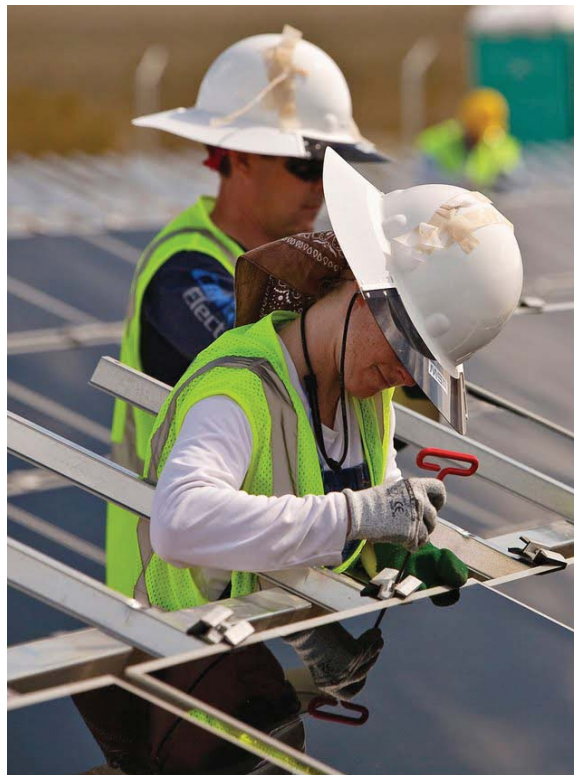
#### PROJECT DESCRIPTION

First Solar Development, Inc. is proposing to develop an approximately 350 megawatt (MW) solar energy facility on public lands. The application specifies that the photovoltaic solar power plant facility would be located north of the Nevada/California border on approximately 2,900 acres of public lands within a right-of-way grant application area of 13,043 acres.

The facility would have the capacity to generate enough electricity to power over 110,000 households. This assumes an average California household use of approximately 7,000 kilowatt hours per year.

The proposed project would require the construction of a 350 MW photovoltaic solar generating facility with associated facilities including a substation, generation tie line, interconnection facilities, and an operation and maintenance building.

The exact areas of each component are subject to change as the project design develops and the SEIS process proceeds.



#### THE EIS PROCESS

The proposed facilities would be on public land managed by the BLM; therefore, approval of the project is considered a Federal action requiring review under and compliance with the National Environmental Policy Act of 1969 (NEPA). Under NEPA, BLM must consider the potential effects of the Silver State South Project on the environment including human, natural, and cultural resources.

##### Human

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**APPENDIX G**  
**BLM Cooperating Agency and Native American**  
**Consultation Letters**

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# United States Department of the Interior



*H. H. Lee*  
11/23/11

## BUREAU OF LAND MANAGEMENT

Southern Nevada District  
Las Vegas Field Office  
4701 N. Torrey Pines Drive  
Las Vegas, NV 89130

<http://www.blm.gov/nv/st/en/fo/lvfo.1.html>

### In Reply Refer To:

2800 (NVS0056)  
N-89530  
N-89669

**NOV 23 2011**

CERTIFIED MAIL 7009 2820 0001 6804 4571 - RETURN RECEIPT REQUESTED

### NOTICE

Col. Thomas C. Chapman  
Army Corps of Engineers  
1325 J. Street  
Sacramento, CA 95814

### NOTICE OF INTENT (NOI) STATUS REQUEST FOR COOPERATING AGENCY STATUS

The Bureau of Land Management (BLM), Southern Nevada District Office, Las Vegas Field Office is the lead Federal agency for the preparation of multiple Environmental Impact Statement (EIS) documents for the construction, operation, maintenance, and termination of renewable energy (solar and wind) and related transmission projects in Clark County and southern Nye County.

The BLM recognizes the need to work together with other qualified agencies to develop coordinated action plans to provide a basis for timely disposition of material issues or problems connected with the development of these EIS documents, and to achieve maximum efficiency for their respective agencies.

On April 21, 2010, the BLM requested your participation as a cooperating agency on any or all of the Southern Nevada District Office Renewable Energy Projects. In that letter, the BLM indicated that you would be notified by mail when a project goes to NOI status, which signals the start of the EIS process.

This notice is your notification that the below listed projects have gone to NOI status and affects your jurisdiction. If you have not previously requested status, you may at this time request to be a cooperating agency on these specific projects by letter or email, should you so desire.

We are currently developing EIS documents for the following projects:

- Silver State South Project (N-89530) – Silver State Solar, LLC, has submitted a new right-of-way (ROW) application for the construction, operation, maintenance, and termination of a 350-megawatt (MW) solar energy generation facility on public lands located in the Ivanpah Valley, 40 miles south of Las Vegas, and approximately 2 miles east of Primm, Nevada. Significant portions of the proposed project were previously evaluated in the Final Environmental Impact Statement (FEIS) for the Silver State Solar Energy Project. The FEIS analyzed the development of a 400-MW solar facility to be constructed in three phases. The Record of Decision for the Silver State Solar Energy Project approved the first phase - a 50-MW project, and indicated that subsequent phases would be reviewed to assess consistency with the prior environmental review conducted as part of the FEIS. Silver State Solar, LLC submitted a new ROW application for an additional 5,651 acres of BLM administered lands in order to address a new location for Phase II and Phase III. The BLM determined that a supplemental EIS (SEIS) must be prepared to analyze the change in design and location. The SEIS will also consider an amendment to the 1998 Las Vegas Resource Managements Plan regarding proposed land and resource use changes within the Jean Lake/Roach Lake Special Recreation Management Area.
- Hidden Hills Transmission Project (N-89669) – Valley Electric Association (VEA) has requested a ROW authorization for the construction, operation, maintenance, and termination of transmission infrastructure improvements in Pahrump and Sandy Valley to Jean, Nevada, and terminating at Eldorado Substation near McCullough Pass. The proposed project will support the delivery of 500-MW into the VEA transmission system through the development of a solar electric generating facility located on private land in Inyo County, California.

Please indicate via a letter or email to the BLM if you are interested in becoming a cooperating agency on the N-89530 Silver State South Project and/or N-89669 Hidden Hills Transmission Project.

Please respond within 15 days of receipt of this letter to:

Bureau of Land Management, RECO  
Attn: Gregory Helseth, Renewable Energy Program Manager  
4701 North Torrey Pines Drive  
Las Vegas, NV 89130-2301  
Email: ghelseth@blm.gov

Mr. Helseth can be reached at 702-515-5173, should you have any questions about this undertaking.

/s/ Vanessa L. Hice  
Vanessa L. Hice  
Assistant Field Manager  
Division of Lands



## United States Department of the Interior

### BUREAU OF LAND MANAGEMENT

Southern Nevada District  
Las Vegas Field Office  
4701 N. Torrey Pines Drive  
Las Vegas, NV 89130

<http://www.blm.gov/nv/st/en/fo/lvfo.1.html>



In Reply Refer To:  
2800 (NVS0056)  
N-89530  
N-89669

1102 8 8 10N

NOV 23 2011

CERTIFIED MAIL 7009 2820 0001 6804 4656 - RETURN RECEIPT REQUESTED

### NOTICE

Tim Sutko  
Clark County - Regional Flood Control  
500 S. Grand Pkwy, Suite 300  
Las Vegas, NV 89106

### REQUEST FOR COOPERATING AGENCY STATUS

The Bureau of Land Management (BLM), Southern Nevada District Office, Las Vegas Field Office is the lead Federal agency for the preparation of multiple Environmental Impact Statement (EIS) documents for the construction, operation, maintenance, and termination of renewable energy (solar and wind) and related transmission projects in Clark County and southern Nye County.

The BLM recognizes the need to work together with other qualified agencies to develop coordinated action plans; to provide a basis for timely disposition of material issues or problems connected with the development of these EIS documents; and to achieve maximum efficiency for their respective agencies.

You are invited to be a cooperating agency as described in the Council on Environmental Quality (CEQ) Regulations at 40 CFR 1501.6 and 1508.5 and the CEQ Guidance Memorandum on Cooperating Agency Status dated January 30, 2002 and February 5, 2002. The CEQ regulations addressing cooperating agencies status implement the NEPA mandate that Federal agencies responsible for preparing NEPA analysis and documentation do so "in cooperation with state and local governments" and other agencies with jurisdiction by law or special expertise. As a cooperating agency you will receive notifications of a project's NEPA status, invitations to interdisciplinary team meetings, and copies of draft documents for your review and feedback.

We are currently developing EIS documents for the following projects:

- Silver State South Project (N-89530) – Silver State Solar, LLC, has submitted a new right-of-way (ROW) application for the construction, operation, maintenance, and termination of a 350-megawatt (MW) solar energy generation facility on public lands located in the Ivanpah Valley, 40 miles south of Las Vegas, and approximately 2 miles east of Primm, Nevada. Significant portions of the proposed project were previously evaluated in the Final Environmental Impact Statement (FEIS) for the Silver State Solar Energy Project. The FEIS analyzed the development of a 400-MW solar facility to be constructed in three phases. The Record of Decision for the Silver State Solar Energy Project approved the first phase - a 50-MW project, and indicated that subsequent phases would be reviewed to assess consistency with the prior environmental review conducted as part of the FEIS. Silver State Solar, LLC submitted a new ROW application for an additional 5,651 acres of BLM administered lands in order to address a new location for Phase II and Phase III. The BLM determined that a supplemental EIS (SEIS) must be prepared to analyze the change in design and location. The SEIS will also consider an amendment to the 1998 Las Vegas Resource Managements Plan regarding proposed land and resource use changes within the Jean Lake/Roach Lake Special Recreation Management Area.
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Please indicate via a letter or email to the BLM if you are interested in becoming a cooperating agency on the N-89530 Silver State South Project and/or N-89669 Hidden Hills Transmission Project.

Please respond within 15 days of receipt of this letter to:

Bureau of Land Management, RECO  
Attn: Gregory Helseth, Renewable Energy Program Manager  
4701 North Torrey Pines Drive  
Las Vegas, NV 89130-2301  
Email: ghelseth@blm.gov

Mr. Helseth can be reached at 702-515-5173, should you have any questions about this undertaking.

**/s/ Vanessa L. Hice**

Vanessa L. Hice  
Assistant Field Manager  
Division of Lands





## United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Southern Nevada District Office  
4701 N. Torrey Pines Drive  
Las Vegas, NV 89130  
<http://www.blm.gov/nv/st/en/fo/lvfo.1.html>

SEP 15 2011

In Reply Refer To:  
2800 (NVS3100)

Mr. Larry Whalon  
Mojave National Preserve  
2701 Barstow Road  
Barstow, California 92311

Re: Cooperating Agency Invitation

Dear Mr. Whalon:

The Bureau of Land Management (BLM) Southern Nevada District Office, through the Las Vegas and Pahrump Field Offices, is the lead Federal Agency for the preparation of multiple Environmental Impact Statement (EIS) documents for the construction, operation, maintenance, and decommissioning of renewable energy (solar and wind) and related transmission projects in Clark County and the southern portion of Nye County.

As each project moves forward through the National Environmental Policy Act (NEPA) process, the BLM will invite you to participate as a cooperating agency. This letter is being sent to you as part of the NEPA process to solicit cooperating agencies in the preparation of these EIS documents. The BLM recognizes the need to work together and develop coordinated action plans; to provide a basis for timely disposition of material issues or problems connected with the development of these EIS documents; and to achieve maximum efficiency for their respective agencies.

We are currently developing EIS documents for the following projects:

- First Solar South Project – Silver State Solar, LLC, has submitted a right-of-way (ROW) application for the construction, operation, maintenance, and termination of a solar energy generation facility on 13,043 acres of public land east of Primm, Nevada. This application expands on ROW application NVN-085801. The proposed solar energy project would consist of photovoltaic panels and related ROW appurtenances, including a substation and switchyard facilities, and would produce about 400 megawatts of electricity.

- Valley Electric Association (VEA) Hidden Hills Transmission Project – VEA has requested a new right-of-way (ROW) authorization for the construction, operation, maintenance, and termination of transmission infrastructure improvements in Pahrump and Sandy valleys to Jean, Nevada, and terminating at Eldorado Substation near McCullough Pass. The proposed project will support the delivery of 500 megawatts (MW) into the VEA transmission system through the development of a solar electric generating facility to be located on private land in Inyo County, California. The proposed improvements will also support the development of additional renewable resource generation facilities in Nevada.

You are invited to be a cooperating agency as described in the Council on Environmental Quality (CEQ) Regulations at 40 CFR 1501.6 and 1508.5 and the CEQ Guidance Memorandum on Cooperating Agency Status dated January 30, 2002 and February 5, 2002. The CEQ regulations addressing cooperating agencies status implement the NEPA mandate that Federal agencies responsible for preparing NEPA analysis and documentation do so “in cooperation with State and local governments” and other agencies with jurisdiction by law or special expertise.

As a cooperating agency you will receive notifications of a project’s NEPA status, invitations to interdisciplinary team meetings, and copies of draft documents for your review and feedback.

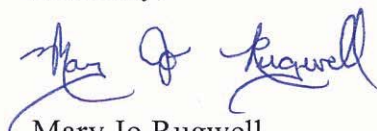
**Please indicate via a letter in writing to the BLM if you are interested in being a cooperating agency on the First Solar South Project and/or the VEA Hidden Hills Transmission Project.**

Please respond within 15 days of receipt of this letter in writing, to:

Bureau of Land Management, Pahrump Field Office  
Attn: Gregory Helseth, Renewable Energy Program Manager  
4701 North Torrey Pines Drive  
Las Vegas, NV 89130-2301

If you have any questions or concerns regarding this undertaking, please contact Greg Helseth at 702-515-5173.

Sincerely,



Mary Jo Rugwell  
District Manager

**TRIBAL CONSULTATION LETTER LIST FOR THE SILVER STATE SOUTH SOLAR PROJECT AND  
COPPER MOUNTAIN SOLAR NORTH/230kV LINE sent certified mail on 8/16/2011:**

Tania Means, Chair  
Las Vegas Paiute Tribe  
One Paiute Drive  
Las Vegas, NV 89106

cc Ramona Salazar, Cultural Coordinator  
Las Vegas Paiute Tribe  
Number One Paiute Drive  
Las Vegas, NV 89106

cc Kenny Anderson  
Las Vegas Paiute Tribe  
Number One Paiute Drive  
Las Vegas, NV 89106

Tim Williams, Chairman  
Fort Mojave Indian Tribe  
500 Merriman Avenue  
Needles, CA 92363

cc Linda Otero, Director  
Aha Makav Cultural Society  
Fort Mojave Indian Tribe  
P.O. Box 5990  
Mojave Valley, AZ 86440

Eldred Enas, Chairman  
Colorado River Indian Tribes  
26600 Mohave Road  
Parker, AZ 85344

cc Mike Tsosi, Director  
Colorado River Indian Tribal Museum  
26600 Mohave Road  
Parker, AZ 85344

Charles Wood, Chairman  
Chemehuevi Indian Tribe  
P.O. Box 92363  
Havasupai Lake, CA 92363

cc Ron Escobar, Secretary-Treasurer  
Chemehuevi Indian Tribe  
P.O. Box 1976  
Havasupai Lake, CA 92363

William Anderson, Chairman  
Moapa Band of Paiutes  
P.O. Box 340  
Moapa, NV 89025

cc Moapa Dept. of Environmental Protection  
P.O. Box 628  
Moapa, NV 89025

cc Deanna Domingo, Cultural Committee Chairperson  
Moapa Cultural Committee  
Moapa Band of Paiutes  
PO Box 628  
Moapa, NV 89025

Eddie Jim, Chairman (not sent certified)  
Pahrump Paiute Tribe  
PO Box 951  
Pahrump, NV 89041



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# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Las Vegas Field Office  
4701 North Torrey Pines Dr  
Las Vegas NV 89130  
[www.blm.gov/nv/](http://www.blm.gov/nv/)



In Reply Refer to:  
8160 (LLNVS00520)

August 16, 2011

CERTIFIED MAIL - RETURN RECEIPT REQUESTED 7011 0110 0000 2076 5034

Tania Means, Chair  
Las Vegas Paiute Tribe  
One Paiute Drive  
Las Vegas, NV 89106

Dear Chair Means:

The Bureau of Land Management (BLM) is formally requesting to inform and consult with the Las Vegas Paiute Tribe regarding two right-of-way applications. One involves the proposed Silver State Solar South Project on BLM lands in the vicinity of Primm, Nevada; and the other is a 230-kV power line from the proposed Copper Mountain Solar North Project on Boulder City-owned land to the existing McCullough Substation in Eldorado Valley. The purpose of this letter is to focus specifically on BLM's responsibilities pursuant to Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR 800 to consult with Indian tribes that attach religious or cultural significance to historic properties that may be affected by an undertaking.

The new Silver State Solar South Project would occur on BLM lands previously analyzed and consulted upon under the Silver State North and South projects in 2009, plus an additional 5,176 contiguous acres on the east side of Roach Dry Lake that will also be analyzed under a supplemental Environmental Impact Statement (EIS) process. First Solar, Inc. proposes to construct and operate a 350-megawatt power generation facility which will be marketed to both California and Nevada. This would include photovoltaic solar arrays, a new substation, switchyard, two groundwater wells, two transmission lines, access roads, and temporary features consisting of office trailers, a construction water storage pond, a mobilization and laydown area, a parking area and utilities. Please see the attached Figure 1 for a Project area map.

The Copper Mountain Solar North Project proposed by Sempra involves 1,400 acres north of the Eldorado Valley dry lake bed within the Boulder City's expanded Energy Zone in the Black Hills Solar Development Area. The associated 230-kV power line would run along a BLM utility corridor within a proposed 120 ft. wide right-of-way. This project is to be analyzed at an environmental assessment (EA) level. Please refer to the attached Figure 1-2 for the project location.

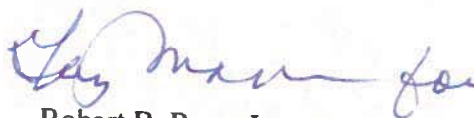
The BLM Las Vegas Field Office and the Renewable Energy Coordination Office will be guiding the National Environmental Policy Act (NEPA) process to disclose and analyze the environmental consequences of both proposed projects. In compliance with various Federal laws, archaeological, biological, botanical, hydrologic and other studies will also be completed. A right-of-way (ROW) grant issued by BLM for the construction, operation and maintenance, and decommissioning of each energy project on public lands will be required.

At this time, the BLM seeks to determine whether the Las Vegas Paiute Tribe would like to be a consulting party for either or both of these projects. The implementing regulations at 36 CFR 800.2(c)(2)(ii)(C) require that Federal agency consultation with an Indian tribe must recognize the government to government relationship and requires the agency to consult with representatives designated or identified by the tribal government. If your tribe is interested in these two projects and to facilitate consultation, the BLM requests that the Las Vegas Paiute Tribal government identify those tribal representatives who have been designated to consult with BLM on these matters.

For information about these undertakings, clarification about this request, or to request a formal government-to-government meeting about this project with me, please contact Kathleen Sprowl, BLM Archaeologist, at (702) 515-5055 or [Kathleen\\_Sprowl@blm.gov](mailto:Kathleen_Sprowl@blm.gov). At your request, BLM management and staff are available to meet with you to discuss your concerns.

We appreciate your consideration of these undertakings and look forward to hearing from you regarding your participation. If you have additional questions or we can provide any clarification, please do not hesitate to call us. I can be reached by telephone at (702) 515-5199. Our office will make every effort to keep you informed of opportunities to be involved with these projects. Thank you in advance for your assistance and we look forward to hearing from you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob Ross", followed by a small flourish.

Robert B. Ross, Jr.  
Field Manager

Enclosures:  
As stated

Cc: Tom Burke/BLM, Nevada State Office, State Archaeologist (NV-930)  
Rebecca Palmer/Nevada State Historic Preservation Office



## United States Department of the Interior

### BUREAU OF LAND MANAGEMENT

Las Vegas Field Office  
4701 North Torrey Pines Dr  
Las Vegas NV 89130  
[www.blm.gov/nv/](http://www.blm.gov/nv/)



In Reply Refer to:

8160 (LLNVS00520)

August 16, 2011

CERTIFIED MAIL - RETURN RECEIPT REQUESTED 7011 0110 0000 2076 5041

Tim Williams, Chairman  
Fort Mojave Indian Tribe  
500 Merriman Avenue  
Needles, CA 92363

Dear Chairman Williams:

The Bureau of Land Management (BLM) is formally requesting to inform and consult with the Mojave Tribe regarding two right-of-way applications. One involves the proposed Silver State Solar South Project on BLM lands in the vicinity of Primm, Nevada; and the other is a 230-kV power line from the proposed Copper Mountain Solar North Project on Boulder City-owned land to the existing McCullough Substation in Eldorado Valley. The purpose of this letter is to focus specifically on BLM's responsibilities pursuant to Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR 800 to consult with Indian tribes that attach religious or cultural significance to historic properties that may be affected by an undertaking.

The new Silver State Solar South Project would occur on BLM lands previously analyzed and consulted upon under the Silver State North and South projects in 2009, plus an additional 5,176 contiguous acres on the east side of Roach Dry Lake that will also be analyzed under a supplemental Environmental Impact Statement (EIS) process. First Solar, Inc. proposes to construct and operate a 350-megawatt power generation facility which will be marketed to both California and Nevada. This would include photovoltaic solar arrays, a new substation, switchyard, two groundwater wells, two transmission lines, access roads, and temporary features consisting of office trailers, a construction water storage pond, a mobilization and laydown area, a parking area and utilities. Please see the attached Figure 1 for a Project area map.

The Copper Mountain Solar North Project proposed by Semptra involves 1,400 acres north of the Eldorado Valley dry lake bed within the Boulder City's expanded Energy Zone in the Black Hills Solar Development Area. The associated 230-kV power line would run along a BLM utility corridor within a proposed 120 ft. wide right-of-way. This project is to be analyzed at an environmental assessment (EA) level. Please refer to the attached Figure 1-2 for the project location.



The BLM Las Vegas Field Office and the Renewable Energy Coordination Office will be guiding the National Environmental Policy Act (NEPA) process to disclose and analyze the environmental consequences of both proposed projects. In compliance with various Federal laws, archaeological, biological, botanical, hydrologic and other studies will also be completed. A right-of-way (ROW) grant issued by BLM for the construction, operation and maintenance, and decommissioning of each energy project on public lands will be required.

At this time, the BLM seeks to determine whether the Mojave Tribe would like to be a consulting party for either or both of these projects. The implementing regulations at 36 CRF 800.2(c)(2)(ii)(C) require that Federal agency consultation with an Indian tribe must recognize the government to government relationship and requires the agency to consult with representatives designated or identified by the tribal government. If your tribe is interested in these two projects and to facilitate consultation, the BLM requests that the Mojave tribal government identify those tribal representatives who have been designated to consult with BLM on these matters.

For information about these undertakings, clarification about this request, or to request a formal government-to-government meeting about this project with me, please contact Kathleen Sprowl, BLM Archaeologist, at (702) 515-5055 or Kathleen\_Sprowl@blm.gov. At your request, BLM management and staff are available to meet with you to discuss your concerns.

We appreciate your consideration of these undertakings and look forward to hearing from you regarding your participation. If you have additional questions or we can provide any clarification, please do not hesitate to call us. I can be reached by telephone at (702) 515-5199. Our office will make every effort to keep you informed of opportunities to be involved with these projects. Thank you in advance for your assistance and we look forward to hearing from you.

Sincerely,



Robert B. Ross, Jr.  
Field Manager

Enclosures:  
As stated

Cc: Tom Burke/BLM, Nevada State Office, State Archaeologist (NV-930)  
Rebecca Palmer/Nevada State Historic Preservation Office



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Las Vegas Field Office  
4701 North Torrey Pines Dr  
Las Vegas NV 89130  
[www.blm.gov/nv/](http://www.blm.gov/nv/)



In Reply Refer to:  
8160 (LLNVS00520)

August 16, 2011

CERTIFIED MAIL - RETURN RECEIPT REQUESTED 7011 0110 00002076 5065

Eldred Enas, Chairman  
Colorado River Indian Tribes  
26600 Mohave Road  
Parker, AZ 85344

Dear Chairman Enas:

The Bureau of Land Management (BLM) is formally requesting to inform and consult with the Colorado River Indian Tribes regarding two right-of-way applications. One involves the proposed Silver State Solar South Project on BLM lands in the vicinity of Primm, Nevada; and the other is a 230-kV power line from the proposed Copper Mountain Solar North Project on Boulder City-owned land to the existing McCullough Substation in Eldorado Valley. The purpose of this letter is to focus specifically on BLM's responsibilities pursuant to Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR 800 to consult with Indian tribes that attach religious or cultural significance to historic properties that may be affected by an undertaking.

The new Silver State Solar South Project would occur on BLM lands previously analyzed and consulted upon under the Silver State North and South projects in 2009, plus an additional 5,176 contiguous acres on the east side of Roach Dry Lake that will also be analyzed under a supplemental Environmental Impact Statement (EIS) process. First Solar, Inc. proposes to construct and operate a 350-megawatt power generation facility which will be marketed to both California and Nevada. This would include photovoltaic solar arrays, a new substation, switchyard, two groundwater wells, two transmission lines, access roads, and temporary features consisting of office trailers, a construction water storage pond, a mobilization and laydown area, a parking area and utilities. Please see the attached Figure 1 for a Project area map.

The Copper Mountain Solar North Project proposed by Sempra involves 1,400 acres north of the Eldorado Valley dry lake bed within the Boulder City's expanded Energy Zone in the Black Hills Solar Development Area. The associated 230-kV power line would run along a BLM utility corridor within a proposed 120 ft. wide right-of-way. This project is to be analyzed at an environmental assessment (EA) level. Please refer to the attached Figure 1-2 for the project location.


The BLM Las Vegas Field Office and the Renewable Energy Coordination Office will be guiding the National Environmental Policy Act (NEPA) process to disclose and analyze the environmental consequences of both proposed projects. In compliance with various Federal laws, archaeological, biological, botanical, hydrologic and other studies will also be completed. A right-of-way (ROW) grant issued by BLM for the construction, operation and maintenance, and decommissioning of each energy project on public lands will be required.

At this time, the BLM seeks to determine whether the Colorado River Indian Tribes would like to be a consulting party for either or both of these projects. The implementing regulations at 36 CFR 800.2(c)(2)(ii)(C) require that Federal agency consultation with an Indian tribe must recognize the government to government relationship and requires the agency to consult with representatives designated or identified by the tribal government. If your tribe is interested in these two projects and to facilitate consultation, the BLM requests that your tribal government identify those tribal representatives who have been designated to consult with BLM on these matters.

For information about these undertakings, clarification about this request, or to request a formal government-to-government meeting about this project with me, please contact Kathleen Sprowl, BLM Archaeologist, at (702) 515-5055 or [Kathleen\\_Sprowl@blm.gov](mailto:Kathleen_Sprowl@blm.gov). At your request, BLM management and staff are available to meet with you to discuss your concerns.

We appreciate your consideration of these undertakings and look forward to hearing from you regarding your participation. If you have additional questions or we can provide any clarification, please do not hesitate to call us. I can be reached by telephone at (702) 515-5199. Our office will make every effort to keep you informed of opportunities to be involved with these projects. Thank you in advance for your assistance and we look forward to hearing from you.

Sincerely,



Robert B. Ross, Jr.  
Field Manager

Enclosures:  
As stated

Cc: Tom Burke/BLM, Nevada State Office, State Archaeologist (NV-930)  
Rebecca Palmer/Nevada State Historic Preservation Office





# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Las Vegas Field Office  
4701 North Torrey Pines Dr  
Las Vegas NV 89130  
[www.blm.gov/nv/](http://www.blm.gov/nv/)



In Reply Refer to:  
8160 (LLNVS00520)

August 16, 2011

CERTIFIED MAIL - RETURN RECEIPT REQUESTED 7011 0110 0000 2076 5119

Charles Wood, Chairman  
Chemehuevi Indian Tribe  
P.O. Box 92363  
Havasupai Lake, CA 92363

Dear Chairman Wood:

The Bureau of Land Management (BLM) is formally requesting to inform and consult with the Chemehuevi Tribe regarding two right-of-way applications. One involves the proposed Silver State Solar South Project on BLM lands in the vicinity of Primm, Nevada; and the other is a 230-kV power line from the proposed Copper Mountain Solar North Project on Boulder City-owned land to the existing McCullough Substation in Eldorado Valley. The purpose of this letter is to focus specifically on BLM's responsibilities pursuant to Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR 800 to consult with Indian tribes that attach religious or cultural significance to historic properties that may be affected by an undertaking.

The new Silver State Solar South Project would occur on BLM lands previously analyzed and consulted upon under the Silver State North and South projects in 2009, plus an additional 5,176 contiguous acres on the east side of Roach Dry Lake that will also be analyzed under a supplemental Environmental Impact Statement (EIS) process. First Solar, Inc. proposes to construct and operate a 350-megawatt power generation facility which will be marketed to both California and Nevada. This would include photovoltaic solar arrays, a new substation, switchyard, two groundwater wells, two transmission lines, access roads, and temporary features consisting of office trailers, a construction water storage pond, a mobilization and laydown area, a parking area and utilities. Please see the attached Figure 1 for a Project area map.

The Copper Mountain Solar North Project proposed by Sempra involves 1,400 acres north of the Eldorado Valley dry lake bed within the Boulder City's expanded Energy Zone in the Black Hills Solar Development Area. The associated 230-kV power line would run along a BLM utility corridor within a proposed 120 ft. wide right-of-way. This project is to be analyzed at an environmental assessment (EA) level. Please refer to the attached Figure 1-2 for the project location.



The BLM Las Vegas Field Office and the Renewable Energy Coordination Office will be guiding the National Environmental Policy Act (NEPA) process to disclose and analyze the environmental consequences of both proposed projects. In compliance with various Federal laws, archaeological, biological, botanical, hydrologic and other studies will also be completed. A right-of-way (ROW) grant issued by BLM for the construction, operation and maintenance, and decommissioning of each energy project on public lands will be required.

At this time, the BLM seeks to determine whether the Chemehuevi Tribe would like to be a consulting party for either or both of these projects. The implementing regulations at 36 CFR 800.2(c)(2)(ii)(C) require that Federal agency consultation with an Indian tribe must recognize the government to government relationship and requires the agency to consult with representatives designated or identified by the tribal government. If your tribe is interested in these two projects and to facilitate consultation, the BLM requests that the Chemehuevi tribal government identify those tribal representatives who have been designated to consult with BLM on these matters.

For information about these undertakings, clarification about this request, or to request a formal government-to-government meeting about this project with me, please contact Kathleen Sprowl, BLM Archaeologist, at (702) 515-5055 or Kathleen\_Sprowl@blm.gov. At your request, BLM management and staff are available to meet with you to discuss your concerns.

We appreciate your consideration of these undertakings and look forward to hearing from you regarding your participation. If you have additional questions or we can provide any clarification, please do not hesitate to call us. I can be reached by telephone at (702) 515-5199. Our office will make every effort to keep you informed of opportunities to be involved with these projects. Thank you in advance for your assistance and we look forward to hearing from you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob Ross", followed by the word "for" in a smaller, cursive script.

Robert B. Ross, Jr.  
Field Manager

Enclosures:  
As stated

Cc: Tom Burke/BLM, Nevada State Office, State Archaeologist (NV-930)  
Rebecca Palmer/Nevada State Historic Preservation Office



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In Reply Refer to:  
8160 (LLNVS00520)

August 16, 2011

CERTIFIED MAIL - RETURN RECEIPT REQUESTED 7011 0110 0000 2076 5089

William Anderson, Chairman  
Moapa Band of Paiutes  
P.O. Box 340  
Moapa, NV 89025

Dear Chairman Anderson:

The Bureau of Land Management (BLM) is formally requesting to inform and consult with the Moapa Paiute Tribe regarding two right-of-way applications. One involves the proposed Silver State Solar South Project on BLM lands in the vicinity of Primm, Nevada; and the other is a 230-kV power line from the proposed Copper Mountain Solar North Project on Boulder City-owned land to the existing McCullough Substation in Eldorado Valley. The purpose of this letter is to focus specifically on BLM's responsibilities pursuant to Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR 800 to consult with Indian tribes that attach religious or cultural significance to historic properties that may be affected by an undertaking.

The new Silver State Solar South Project would occur on BLM lands previously analyzed and consulted upon under the Silver State North and South projects in 2009, plus an additional 5,176 contiguous acres on the east side of Roach Dry Lake that will also be analyzed under a supplemental Environmental Impact Statement (EIS) process. First Solar, Inc. proposes to construct and operate a 350-megawatt power generation facility which will be marketed to both California and Nevada. This would include photovoltaic solar arrays, a new substation, switchyard, two groundwater wells, two transmission lines, access roads, and temporary features consisting of office trailers, a construction water storage pond, a mobilization and laydown area, a parking area and utilities. Please see the attached Figure 1 for a Project area map.

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The BLM Las Vegas Field Office and the Renewable Energy Coordination Office will be guiding the National Environmental Policy Act (NEPA) process to disclose and analyze the environmental consequences of both proposed projects. In compliance with various Federal laws, archaeological, biological, botanical, hydrologic and other studies will also be completed. A right-of-way (ROW) grant issued by BLM for the construction, operation and maintenance, and decommissioning of each energy project on public lands will be required.

At this time, the BLM seeks to determine whether the Moapa Paiute Tribe would like to be a consulting party for either or both of these projects. The implementing regulations at 36 CRF 800.2(c)(2)(ii)(C) require that Federal agency consultation with an Indian tribe must recognize the government to government relationship and requires the agency to consult with representatives designated or identified by the tribal government. If your tribe is interested in these two projects and to facilitate consultation, the BLM requests that the Moapa Paiute Tribal government identify those tribal representatives who have been designated to consult with BLM on these matters.

For information about these undertakings, clarification about this request, or to request a formal government-to-government meeting about this project with me, please contact Kathleen Sprowl, BLM Archaeologist, at (702) 515-5055 or Kathleen\_Sprowl@blm.gov. At your request, BLM management and staff are available to meet with you to discuss your concerns.

We appreciate your consideration of these undertakings and look forward to hearing from you regarding your participation. If you have additional questions or we can provide any clarification, please do not hesitate to call us. I can be reached by telephone at (702) 515-5199. Our office will make every effort to keep you informed of opportunities to be involved with these projects. Thank you in advance for your assistance and we look forward to hearing from you.

Sincerely,

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Robert B. Ross, Jr.  
Field Manager

Enclosures:  
As stated

Cc: Tom Burke/BLM, Nevada State Office, State Archaeologist (NV-930)  
Rebecca Palmer/Nevada State Historic Preservation Office





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In Reply Refer to:  
8160 (LLNVS00520)

August 16, 2011

Eddie Jim, Chairman  
Pahrump Paiute Tribe  
P.O. Box 951  
Pahrump, NV 89041

Dear Chairman Jim:

The Bureau of Land Management (BLM) is requesting to inform and coordinate with the Pahrump Tribe regarding two right-of-way applications. One involves the proposed Silver State Solar South Project on BLM lands in the vicinity of Primm, Nevada; and the other is a 230-kV power line from the proposed Copper Mountain Solar North Project on Boulder City-owned land to the existing McCullough Substation in Eldorado Valley. The purpose of this letter is to focus specifically on BLM's responsibilities pursuant to Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR 800 to consult with Indian tribes that attach religious or cultural significance to historic properties that may be affected by an undertaking.

The new Silver State Solar South Project would occur on BLM lands previously analyzed and consulted upon under the Silver State North and South projects in 2009, plus an additional 5,176 contiguous acres on the east side of Roach Dry Lake that will also be analyzed under a supplemental Environmental Impact Statement (EIS) process. First Solar, Inc. proposes to construct and operate a 350-megawatt power generation facility which will be marketed to both California and Nevada. This would include photovoltaic solar arrays, a new substation, switchyard, two groundwater wells, two transmission lines, access roads, and temporary features consisting of office trailers, a construction water storage pond, a mobilization and laydown area, a parking area and utilities. Please see the attached Figure 1 for a Project area map.

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The BLM Las Vegas Field Office and the Renewable Energy Coordination Office will be guiding the National Environmental Policy Act (NEPA) process to disclose and analyze the environmental consequences of both proposed projects. In compliance with various Federal laws, archaeological, biological, botanical, hydrologic and other studies will also be completed. A right-of-way (ROW) grant issued by BLM for the construction, operation and maintenance, and decommissioning of each energy project on public lands will be required.

At this time, the BLM seeks to determine whether the Pahrump Tribe would like to be an interested party for either or both of these projects. The implementing regulations at 36 CRF 800.2(c)(2)(ii)(C) require that Federal agency consultation with an Indian tribe must recognize the government to government relationship and requires the agency to consult with representatives designated or identified by the tribal government. Although the Pahrump Paiute Tribe is not federally recognized, the BLM would like to coordinate with you if your tribe has religious or cultural knowledge or interest in these two project areas and to have you identify those tribal representatives who have been designated by your tribal council to interact with the BLM on these matters.

For information about these undertakings, clarification about this request, or to request a meeting about this project with me, please contact Kathleen Sprowl, BLM Archaeologist, at (702) 515-5055 or [Kathleen\\_Sprowl@blm.gov](mailto:Kathleen_Sprowl@blm.gov). At your request, BLM management and staff are available to meet with you to discuss your concerns.

We appreciate your consideration of these undertakings and look forward to hearing from you if you are interested in participating. If you have additional questions or we can provide any clarification, please do not hesitate to call us. I can be reached by telephone at (702) 515-5199.

Sincerely,



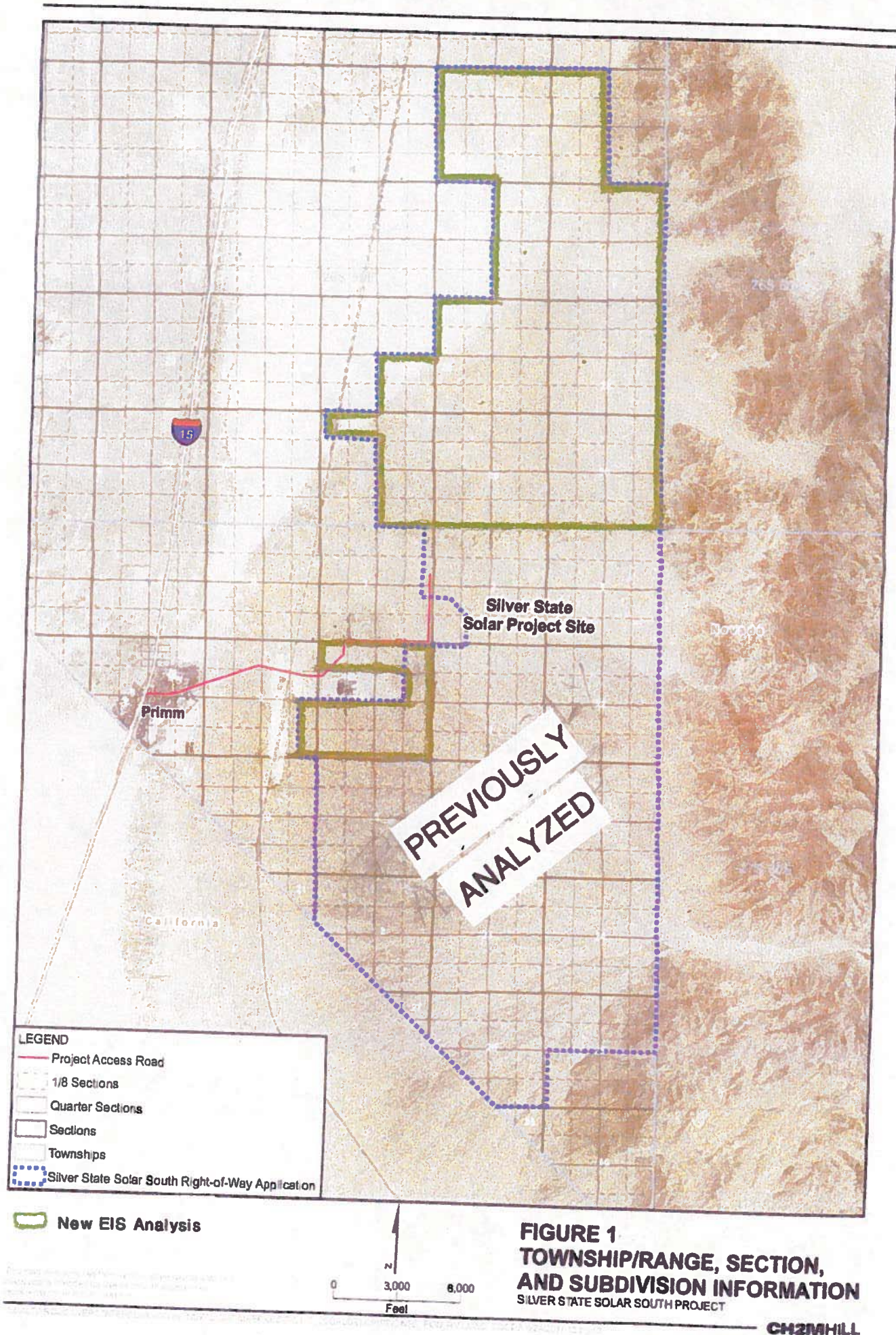
Robert B. Ross, Jr.  
Field Manager

Enclosures:

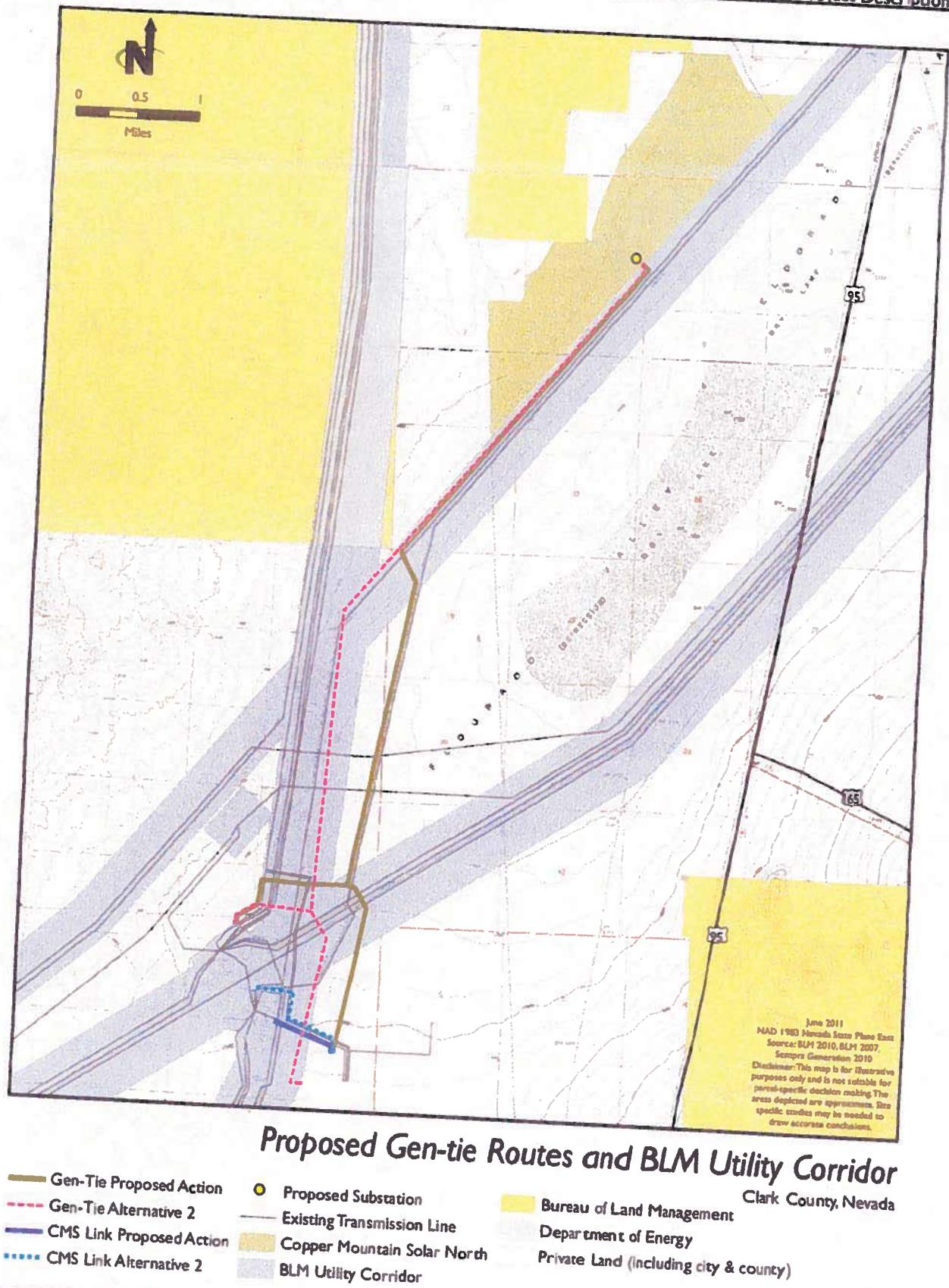
As stated

Cc: Tom Burke/BLM, Nevada State Office, State Archaeologist (NV-930)  
Rebecca Palmer/Nevada State Historic Preservation Office









## **APPENDIX H**

### **Public Comment Analysis by Resource Category**

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# Silver State Solar South Project

## Count of Comments by Resource

Air Quality	4
Climate Change	5
Cultural and Historic Resource	5
Environmental Justice	1
Fire Management	1
Geology and Mineral Extraction	1
Hazardous Materials and Hazardous Solid Waste	2
Land Use	6
Livestock Grazing	1
Noise	2
Noxious and Invasive Weed Management	5
Paleontological Resource	1
Recreation	23
Social and Economic Resource	21
Soil Resource	1
Special Designation	10
Special Status Species	27
Travel Management and OHV Use	29
Vegetation Resource	3
Visual Resource	8
Water Resource	13
Watershed Management	2
Wildlife Resource	10
Alternative (EIS Process)	24
NEPA Process (EIS Process)	12
Project Design (EIS Process)	15
Purpose and Need (EIS Process)	2
Non-Substantive (EIS Process)	19
Cumulative Impact (EIS Process)	16
<b>Total # of Comments</b>	<b>200</b>

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Comment ID	Comment
25-1	<p>I want to go back to the dust issue. And let's answer that again. You said two times a year those panels are cleaned and they go through a maintenance process; is that correct?</p> <p>What's the cost of cleaning those panels? Have you guys determined that, oh, now is the time to clean them, how effective is the cost? I mean, is it a big deal or is it pretty simple, pretty quick and cost effective just to do it?</p>
29-2	<p>Silver State Solar, LLC identified two causes of air quality concerns: vehicle traffic and combustion emissions from equipment. Another potential cause of air quality concerns includes dust concerns due to the method of site preparation. Silver State Solar, LLC should identify methods used that will be used to prevent dust concerns. In the Plan of Development, Silver State Solar, LLC should also indicate the long-term air quality concerns.</p>
53-7	<ol style="list-style-type: none"><li>1. Particulates<ol style="list-style-type: none"><li>a. Insure that all equipment meet all emission requirements during and post construction.</li><li>b. Control all dust emissions during and post construction.</li><li>c. Limit areas needing veg. removal and use dust suppression techniques including limiting speed on dirt roads.</li></ol></li><li>2. NOX, SOX Insure that all equipment meets all emission requirements during and post construction.</li></ol>

55-10

The SDEIS should provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards, criteria pollutant nonattainment areas, and potential air quality impacts of the proposed projects (including cumulative and indirect impacts). Such an evaluation is necessary to assure compliance with State and Federal air quality regulations, and to disclose the potential impacts from temporary or cumulative degradation of air quality.

The SDEIS should describe and estimate air emissions from potential construction and maintenance activities, as well as proposed mitigation measures to minimize those emissions. EPA recommends an evaluation of the following measures to reduce emissions of criteria air pollutants and hazardous air pollutants (air toxics).

Recommendations:

- Existing Conditions - The SDEIS should provide a detailed discussion of ambient air conditions, National Ambient Air Quality Standards, and criteria pollutant nonattainment areas in all areas considered for solar development.
- Quantify Emissions - The SDEIS should estimate emissions of criteria pollutants from the proposed projects and discuss the timeframe for release of these emissions over the lifespan of the projects. The SDEIS should describe and estimate emissions from potential construction activities, as well as proposed mitigation measures to minimize these emissions.
- Specify Emission Sources - The SDEIS should specify the emission sources by pollutant from mobile sources, stationary sources, and ground disturbance. This source specific information should be used to identify appropriate mitigation measures and areas in need of the greatest attention.
- Construction Emissions Mitigation Plan - The SDEIS should include a draft Construction Emissions Mitigation Plan and ultimately adopt this plan in the ROD. In addition to all applicable local, state, or federal requirements, we recommend the following control measures (Fugitive Dust, Mobile and Stationary Source and Administrative) be included in the Construction Emissions Mitigation Plan in order to reduce impacts associated with emissions of particulate matter and other toxics from construction-related activities:
  - Fugitive Dust Source Controls: The SDEIS should identify the need for a Fugitive Dust Control Plan to reduce Particulate Matter 10 and Fine Particulate Matter 2.5 emissions during construction and operations. We recommend that the plan include these general commitments:
    - o Stabilize heavily used unpaved construction roads with a non-toxic soil stabilizer or soil weighting agent that will not result in loss of vegetation, or increase other environmental impacts.
    - o During grading use water, as necessary, on disturbed areas in construction sites to control visible plumes.
    - o Vehicle Speed
      - Limit speeds to 25 miles per hour on stabilized unpaved roads as long as such speeds do not create visible dust emissions.
      - Limit speeds to 10 miles per hour or less on unpaved areas within construction sites on unstabilized (and unpaved) roads.
      - Post visible speed limit signs at construction site entrances.
    - o Inspect and wash construction equipment vehicle tires, as necessary, so they are free of dirt before entering paved roadways, if applicable.
    - o Provide gravel ramps of at least 20 feet in length at tire washing/cleaning stations, and ensure construction vehicles exit construction sites through treated entrance roadways, unless an alternative route has been approved by appropriate lead agencies, if applicable.
    - o Use sandbags or equivalent effective measures to prevent run-off to roadways in construction areas adjacent to paved roadways. Ensure consistency with the project's Storm Water Pollution Prevention Plan, if such a plan is required for the project
    - o Sweep the first 500 feet of paved roads exiting construction sites, other unpaved roads en route from the construction site, or construction staging areas whenever dirt or runoff from construction activity is visible on paved roads, or at least twice daily (less during periods of precipitation).
    - o Stabilize disturbed soils (after active construction activities are completed) with a non-toxic soil stabilizer, soil weighting agent, or other approved soil stabilizing method.

- 55-10
- o Cover or treat soil storage piles with appropriate dust suppressant compounds and disturbed areas that remain inactive for longer than 10 days. Provide vehicles (used to transport solid bulk material on public roadways and that have potential to cause visible emissions) with covers. Alternatively, sufficiently wet and load materials onto the trucks in a manner to provide at least one foot of freeboard.
  - o Use wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) where soils are disturbed in construction, access and maintenance routes, and materials stock pile areas. Keep related windbreaks in place until the soil is stabilized or permanently covered with vegetation.
- Mobile and Stationary Source Controls:
    - o If practicable, lease new, clean equipment meeting the most stringent of applicable Federal or State Standards. In general, commit to the best available emissions control technology. Tier 4 engines should be used for project construction equipment to the maximum extent feasible.
    - o Where Tier 4 engines are not available, use construction diesel engines with a rating of 50 hp or higher that meet, at a minimum, the Tier 3 California Emission Standards for Off-Road Compression-Ignition Engines<sup>6</sup>, unless such engines are not available.
    - o Where Tier 3 engine is not available for off-road equipment larger than 100 hp, use a Tier 2 engine, or an engine equipped with retrofit controls to reduce exhaust emissions of nitrogen oxides and diesel particulate matter to no more than Tier 2 levels.
    - o Consider using electric vehicles, natural gas, biodiesel, or other alternative fuels during construction and operation phases to reduce the project's criteria and greenhouse gas emissions.
    - o Plan construction scheduling to minimize vehicle trips.
    - o Limit idling of heavy equipment to less than 5 minutes and verify through unscheduled inspections.
    - o Maintain and tune engines per manufacturer's specifications to perform at CARB and/or EPA certification levels, prevent tampering, and conduct unscheduled inspections to ensure these measures are followed.
  - Administrative controls:
    - o Develop a construction-traffic and parking management plan that maintains traffic flow and plan construction to minimize vehicle trips.
    - o Identify any sensitive receptors in the project area, such as children, elderly, and infirmed, and specify the means by which you will minimize impacts to these populations (e.g. locate construction equipment and staging zones away from sensitive receptors and building air intakes).
    - o Include provisions for monitoring fugitive dust in the fugitive dust control plan and initiate increased mitigation measures to abate any visible dust plumes.

Comment ID	Comment
30-7	<p>The NEPA documents should provide a detailed review and analysis of the direct, indirect and cumulative impacts of the proposed project and all associated infrastructure including roads and transmission lines on the desert tortoise population.</p> <p>Department of the Interior Order No. 3226 mandates that the BLM must consider the impacts of each proposed alternative with respect to global climate change in its NEPA reviews. The agencies should use the recently released USGS desert tortoise habitat model to determine likely changes in desert tortoise habitat quality in the area and the importance of the desert tortoise habitat. In addition to addressing climate change in the cumulative effects analysis, the DEIS should address the carbon footprint of the project and any losses to carbon storage and sequestration it will engender.</p>
44-2	The area is a vital pristine corridor for migration of species in response to climate change or fluctuation. As a corridor area, it cannot be replaced.
52-2	As we transition toward a clean energy future, it is imperative for our future and the future of our wild places and wildlife that we strike a balance between addressing the near term impacts of large scale solar energy development with the long-term impacts of climate change on our biological diversity, fish and wildlife habitat and natural landscapes. To ensure that the proper balance is achieved, we need smart planning for renewable power that avoids and minimizes adverse impacts on wildlife and wild lands.
52-13	Maintaining habitat connectivity at the landscape level is considered essential in maintaining self-sustaining Desert tortoise populations through gene-flow, providing opportunities for individuals to re-colonize suitable habitats, and maintaining access to potentially suitable habitat due to the effects of climate change.
55-9	<p>Scientific evidence supports the concern that continued increases in greenhouse gas emissions resulting from human activities will contribute to climate change. Global warming is caused by emissions of carbon dioxide and other heat-trapping gases. On December 7, 2009, the EPA determined that emissions of GHGs contribute to air pollution that "endangers public health and welfare" within the meaning of the Clean Air Act. One report indicates that observed changes in temperature, sea level, precipitation regime, fire frequency, and agricultural and ecological systems reveal that California is already experiencing the measurable effects of climate change. The report indicates that climate change could result in the following changes in California: poor air quality; more severe heat; increased wildfires; shifting vegetation; declining forest productivity; decreased spring snowpack; water shortages; a potential reduction in hydropower; a loss in winter recreation; agricultural damages from heat, pests, pathogens, and weeds; and rising sea levels resulting in shrinking beaches and increased coastal floods.</p> <p>Recommendations:</p> <p>The SDEIS should consider how climate change could potentially influence the proposed project, specifically within sensitive areas, and assess how the projected impacts could be exacerbated by climate change.</p> <p>The SDEIS should quantify and disclose the anticipated climate change benefits of solar energy. We suggest quantifying greenhouse gas emissions from different types of generating facilities including solar, geothermal, natural gas, coal-burning, and nuclear and compiling and comparing these values.</p> <p>The SDEIS should describe how existing and/or proposed water sources for the proposed project may be affected by climate change. At a minimum, the EPA expects a qualitative discussion of impacts to water supply and the adaptability of the project to these changes.</p>

Comment ID	Comment
12-2	Preserving any archaeological sites found in the area.
18-2	<p>Did you run into any Native Americans complaining about these plants or anything, controversy?</p> <p>Well, I was once in a meeting with Bright Source, and BLM never informed me that there was five complaints with the Native American tribes with five plants in California I think it was. I guess I'd have to ask the question myself because BLM did not tell me anything about that. Thank you.</p>
18-3	I imagine there are anthropology reports that had been already done; is that right?
30-16	The Mojave Desert is rich in structures and artifacts of significant cultural value that are irreplaceable once lost. A Class III cultural resources survey and report is needed to satisfy the requirements of NEPA and the National Historic Preservation Act. The DEIS should discuss and analyze all impacts to paleontological and Native American cultural resources. Building new transmission lines could cause physical damage to artifacts and sites, expose cultural resources to looters, and could increase fires due to soil disturbance and subsequent weed invasion placing these cultural resources at risk of future damage.
55-12	<p>Executive Order 13175, Consultation and Coordination with Indian Tribal Governments (November 6, 2000), was issued in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, and to strengthen the United States government-to-government relationships with Indian tribes.</p> <p>Recommendation: The SDEIS should describe the process and outcome of government-to government consultation between the BLM and each of the tribal governments within the project area, issues that were raised (if any), and how those issues were addressed in the selection of the proposed alternative.</p> <p>National Historic Preservation Act and Executive Order 13007 Consultation for tribal cultural resources is required under Section 106 of the National Historic Preservation Act. Historic properties under the NHPA are properties that are included in the National Register of Historic Places or that meet the criteria for the National Register. Section 106 of the NHPA requires a federal agency, upon determining that activities under its control could affect historic properties, consult with the appropriate State Historic Preservation Officer/Tribal Historic Preservation Officer. Under NEPA, any impacts to tribal, cultural, or other treaty resources must be discussed and mitigated. Section 106 of the NHPA requires that Federal agencies consider the effects of their actions on cultural resources, following regulation in 36 CFR 800.</p> <p>Executive Order 13007, Indian Sacred Sites (May 24, 1996), requires federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian Religious practitioners, and to avoid adversely affecting the physical integrity, accessibility, or use of sacred sites. It is important to note that a sacred site may not meet the National Register criteria for a historic property and that, conversely, a historic property may not meet the criteria for a sacred site.</p> <p>Recommendation: The SDEIS should address the existence of Indian sacred sites in the project areas. It should address Executive Order 13007, distinguish it from Section 106 of the NHPA, and discuss how the BLM will avoid adversely affecting the physical integrity, accessibility, or use of sacred sites, if they exist. The SDEIS should provide a summary of all coordination with Tribes and with the SHPO/HPO, including identification of NRHP eligible sites, and development of a Cultural Resource Management Plan.</p>



Comment ID	Comment
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55-13	<p>Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (February 11, 1994) and the more recent Interagency Memorandum of Understanding on Environmental Justice and Executive Order 12898 (August 4, 2011) direct federal agencies to identify and address disproportionately high and adverse human health or environmental effects on minority and low-income populations, allowing those populations a meaningful opportunity to participate in the decision-making process. Guidance by CEQ clarifies the terms low-income and minority population (which includes Native Americans) and describes the factors to consider when evaluating disproportionately high and adverse human health effects.</p> <p>Recommendations:</p> <p>The SDEIS should include an evaluation of environmental justice populations within the geographic scope of the projects. If such populations exist, the SDEIS should address the potential for disproportionate adverse impacts to minority and low-income populations, and the approaches used to foster public participation by these populations. Assessment of the projects impact on minority and low-income populations should reflect coordination with those affected populations.</p> <p>The SDEIS should describe outreach conducted to all other communities that could be affected by the project, since rural communities may be among the most vulnerable to health risks associated with the project.</p>
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Comment ID	Comment
30-12	The DEIS should address the effects that each alternative for each project may have on wildfire risks. Wildfires are becoming increasingly common in the Mojave Desert facilitated by the spread of invasive weeds and climate change. Wildfires can result in type conversion of large expanses of habitat. Wildfires could be caused by construction or operation of the transmission lines. Development of roads and transmission lines could encourage increased motorized vehicle access which increases fire risk especially when coupled with the spread of invasive weeds.

Comment ID	Comment
48-1	<p>The SEIS is in conflict with four active placer mining claims, controlled by the Association; my clients.</p> <p>On February 28, 2010, each of the eight-member association (locators) signed an “Association Placer Mining Claim Agreement”, whereby each agreed to enter into the agreement for the purpose of exploration, development and mining of the association placer claims. Each member has equal ownership, risk and reward as outlined in the Agreement. The signed Agreement was filed at the Clark County Recorder’s office on April 16, 2010. The recorded Agreement stamped by the Recorder was filed by BLM on April 27, 2010.</p> <p>The FITO association placer claims (NMC1022853 - NMC 1022856) were located for the eight members of the Association on April 4, 2010, prior to the initial ROW application for the Silver State Solar Project by Nextlight Renewable Power, LLC (now First Solar). Prior to locating the placer claims, the land status was first checked by using available MT Plats at the Clark County Surveyor’s office. No other mining claims were found in the areas of concern. The BLM’s LR2000 and Geocommunicator databases were checked for conflicting claims, and/or lands withdrawn from mineral entry. No conflicts were noted, and no evidence of active claims or withdrawals were found in the field during our land surveys.</p> <p>The initial Silver State Solar EIS, dated September 2010, Chapter 3.172 – Locatable Minerals, stated, “There are also four active mining claims that have been filed on land within the ROW application area for the Proposed Project (Table 3.17-1).” In addition, in Chapter 4.20.17 – Energy and Minerals, stated, “In 2010, four new mining claims were filed for land within the Proposed Project. Because these claims will have supremacy over the land and the Proposed Project, no adverse cumulative impacts would occur.”</p> <p>A Record of Decision (ROD) and Right-of-Way (ROW) were granted to the Silver State Solar Power “North” Project by BLM on October 12, 2010. The BLM considered the application as two independent applications, the Silver State North (N-85077) project, and the Silver State South (N-85801) project. BLM authorized only the north project due to careful consideration of conflicts in the south project such as wildlife, off-road use and mining claims.</p> <p>On August 9, 2011, an “Affidavit and Notice of Intent to Hold Mining Claims” was filed by the Association at the Clark County Recorder, and Maintenance fees for 2012 were paid to BLM on August 10, 2011.</p>

Comment ID	Comment
30-11	The DEIS should disclose any potentially toxic or hazardous wastes that may be associated with these projects during project construction, operation, and maintenance including pesticides and herbicides.
55-11	<p>The SDEIS should address potential direct, indirect and cumulative impacts of hazardous waste from construction and operation of the proposed facility. The document should identify projected hazardous waste types and volumes, and expected storage, disposal, and management plans. It should address the applicability of state and federal hazardous waste requirements. Appropriate mitigation should be evaluated, including measures to minimize the generation of hazardous waste (i.e., hazardous waste minimization). Alternate industrial processes using less toxic materials should be evaluated as mitigation since such processes could reduce the volume or toxicity of hazardous materials requiring management and disposal as hazardous waste.</p> <p>PV Production/Recycling</p> <p>PV production can address the full product life cycle, from raw material sourcing through end of life collection and reuse or recycling. PV companies can minimize their environmental impacts during raw material extraction and minimize the amount of rare materials used in the product. PV manufacturing facilities exist that are zero waste and have no air or water emissions. PV companies can facilitate future material recovery for reuse or recycling. Several solar companies have developed approaches to recycling solar modules that enable treatment and processing of PV module components into new modules or other projects. Solar companies can facilitate collection and recycling through buy-back programs or collection and recycling guarantees. Several companies provide recycling programs that pay all packaging, transportation, and recycling costs.</p> <p>Recommendation:</p> <p>EPA recommends that the proponent strive to address the full product life cycle by sourcing PV components from a company that: 1) minimizes environmental impacts during raw material extraction; 2) manufactures PV panels in a zero waste facility; 3) provides future PV disassembly for material recovery for reuse and recycling; and 4) minimizes the carbon footprint associated with the manufacture and transport of PV panels.</p> <p>Project Decommissioning, Site Restoration and Financial Assurance</p> <p>Desert ecosystems have evolved over millennia to withstand severe conditions. Decommissioning and site restoration in an arid environment may take much longer and require more extensive intervention than in a more temperate region. Desert ecosystems may take many years to recover even with active intervention. Disturbances can further slow this process and restoration has been found to be problematic at other sites in arid ecosystems with large-scale disturbance, including open-pit mines. The EPA recommends that the site restoration planning take into account the uncertainty and harshness of the desert climate and include monitoring of revegetation progress for at least ten years to ensure that the effort is successful.</p> <p>Recommendation:</p> <p>The EPA recommends that the SDEIS include a requirement for a decommissioning and site restoration. The plan should include: 1) cost estimates - including a requirement for the project owner to secure a performance bond, surety bond, letter of credit, corporate guarantee, or other fOlm of financial assurance adequate to cover the cost of decommissioning and effective restoration; 2) time allotted to complete the decommissioning/restoration; 3) description of the structures, facilities, foundations to be removed; and 4) description of restoration measures, including re-contouring of the surface and revegetation to a condition reasonably similar to the original condition.</p>

Comment ID	Comment
2-3	I must stress, we need joint use!
50-1	<p>The ROW application seeks 13,043 acres, although the footprint of the proposed solar energy facilities apparently would only require approximately 2,900 acres. A significant amount of the lands within the boundaries of First Solar's requested ROW fall within the lands designated by Title V of Public Law 107-282 for future use as an Airport Environs Overlay District (Overlay District) for the SNSA. In addition, the proposed First Solar South Project as built would be immediately adjacent to, and would overlap in part with, the Overlay District.</p> <p>As discussed in the original FEIS, pursuant to Public Law 106-362, the BLM patented to Clark County a 6,000-acre site in the Ivanpah Valley (Airport Site) for the purpose of constructing and operating an airport and related infrastructure.<sup>2</sup> Subsequently, Congress directed that an additional 17,000 acres surrounding the Airport Site (the Overlay District) be conveyed to the County upon final federal approval of the SNSA (Public Law 107-282).<sup>3</sup> BLM adequately recognized the congressional mandate for the Overlay District in its statement of Purpose and Need in the FEIS approving Silver State North.<sup>4</sup> Pursuant to this congressional mandate, the Federal Aviation Administration (FAA) and BLM have begun work on the necessary environmental reviews for the SNSA. Although work on the environmental impact statement (EIS) for the SNSA was temporarily suspended in 2010 due to the economic downturn, Clark County is continuing its planning efforts for the new airport.</p> <p>Second, we remind BLM of its commitment to ensuring that authorized land uses on airport-related lands are compatible with the uses authorized by Congress in Public Laws 106-362 (the Ivanpah Valley Airport Public Lands Transfer Act of 2000) and 107-282 (the Clark County Conservation of Public Land and Natural Resources Act of 2002).<sup>8</sup> To ensure this, BLM should coordinate the terms of any relevant land use authorization with Clark County. Such coordination will enable BLM and Clark County to fulfill their respective obligations under federal law to prevent any potential future airspace incompatibility and to take all appropriate actions to restrict incompatible land uses near the SNSA Site.</p>
50-4	<p>while CCDOA neither supports nor opposes the Project, the actual ROW application under consideration by BLM covers considerably more land than has been identified as necessary for the siting of the Project itself. This is a critical distinction because CCDOA has serious concerns about potentially conflicting uses within the broad ROW at issue in the SEIS. CCDOA is committed to ensuring that any new infrastructure in southern Nevada is compatible with the siting, construction, and operation of the SNSA. In light of that fact, CCDOA files these comments on the Proposed Project.</p>

Comment ID	Comment
50-5	<p>The 13,043-acre ROW requested for the First Solar South Project encompasses a considerable amount of the land previously identified as part of the Overlay District for the SNSA: namely, all or parts of the T.26S, R.59E Sections 14, 27, and 34; and T.27S, R.59E, Sections 9 and 10. In addition, the proposed ROW would also encompass the two entire sections of land required by CCDOA for flood control for the SNSA, and addressed in CCDOA's 2009 ROW application to BLM (T.26S, R.59E, Sections 23 and 26). See Map at Exhibit C. This raises two significant issues for consideration in the SEIS.</p> <p>First, we remind BLM of its express commitment to not authorize land uses that would preclude the siting of the SNSA stormwater facilities.<sup>7</sup> CCDOA is currently planning to use all or parts of T.26S, R.59E Sections 14, 23, 26, 27, and 34 for flood control purposes needed to support the construction and operation of the airport. Therefore, in the SEIS for First Solar South, BLM must examine the degree to which granting the full 13,043-acre ROW would interfere with the proposed SNSA and its ancillary facilities, and deny any part of First Solar's application that is incompatible with the uses proposed in the SNSA EIS.</p> <p>In the underlying FEIS, BLM adequately addressed the issue of FAA regulations at 14 CFR Part 77, which require that any party proposing to construct a structure taller than 200 feet or within 20,000 feet of a proposed airport must provide notice to the FAA through FAA Form 7460 and receive a Determination from the FAA regarding whether the proposed structure or structures are hazards to air navigation. CCDOA recommends that the SEIS incorporate a similar discussion of these critical regulatory obligations and include a mitigation measure such as MM HAZ-6.</p>
52-14	<p>Furthermore, in the subsequent 6/10/2011 biological opinion for the Ivanpah SEGS, which is described as replacing the 10/1/2010 version, FWS included revised conservation recommendations:</p> <ul style="list-style-type: none"> <li>· We recommend that the Bureau amend the necessary land use plans to prohibit large-scale development (e.g., solar energy facilities, wind development, etc.) within all remaining portions of the Ivanpah Valley to reduce fragmentation within the critical linkage between the Ivanpah Critical Habitat Unit and the Eldorado Critical Habitat Unit.</li> <li>· We recommend that the Bureau consider alternative configurations for this project and the First Solar-Silver State Project that would focus ground disturbance on lands closer to Ivanpah Lake that are likely to have fewer desert tortoises and are less crucial to population connectivity.</li> </ul>
55-14	<p>The SDEIS should discuss how the proposed action would support or conflict with the objectives of federal, state, tribal or local land use plans, policies and controls in the project areas. The term "land use plans" includes all types of formally adopted documents for land use planning, conservation, zoning and related regulatory requirements. Proposed plans not yet developed should also be addressed if they have been formally proposed by the appropriate government body in a written form (CEQ's Forty Questions, #23b).</p>

Comment ID	Comment
27-1	<p>We did not find that the DEIS analysis incorporated an assessment of the direct, indirect and cumulative impacts of the proposed project on areas where MSHCP mitigation actions have been funded. These areas include, at a minimum:</p> <ul style="list-style-type: none"><li>• Within the Jean Lake, Roach Lake and McCullough Mountains grazing allotments, at costs of \$99,008.33, \$7,014.71, and \$154,859.18, respectively.</li><li>• Areas where Clark County funds have provided for weed monitoring and treatment activities, including the Interagency Weed Sentry Project.</li><li>• Areas where Clark County funds were provided to the Nevada System of Higher Education to study the white-margined penstemon (<i>Penstemon albomarginatus</i>) and its habitat.</li></ul>

Comment ID	Comment
29-4	The ROW application indicates that Primm may be subject to noise due to increased traffic volume. It is requested that Silver State Solar, LLC coordinate traffic access with Primm. Information that is important includes: proposed days of work, proposed hours of work, whether site access is expected to be through Primm, number of trips per day, etc.
53-5	<div>1. Establish baseline data for sound reaching Mojave National Preserve and monitor/limit noise during construction.</div> <div>2. No construction noise from 6:00 PM to 6:00 AM. Continue monitoring and controlling noise 6 to 6.</div>



Comment ID	Comment
27-1	<p>We did not find that the DEIS analysis incorporated an assessment of the direct, indirect and cumulative impacts of the proposed project on areas where MSHCP mitigation actions have been funded. These areas include, at a minimum:</p> <ul style="list-style-type: none"> <li>• Within the Jean Lake, Roach Lake and McCullough Mountains grazing allotments, at costs of \$99,008.33, \$7,014.71, and \$154,859.18, respectively.</li> <li>• Areas where Clark County funds have provided for weed monitoring and treatment activities, including the Interagency Weed Sentry Project.</li> <li>• Areas where Clark County funds were provided to the Nevada System of Higher Education to study the white-margined penstemon (<i>Penstemon albomarginatus</i>) and its habitat.</li> </ul>
30-10	<p>Invasive weeds grow easily wherever the natural vegetation and biological soil crusts are disturbed. The disturbance to the soil and natural vegetation that will occur as a result of the construction and maintenance of the proposed transmission line must not be allowed to establish a “weed corridor” across the landscape. Once established, weeds are almost impossible to remove permanently.</p> <p>Invasive plants and weeds are threats to native habitat, rare plants, and sensitive species. They pose an immense fire hazard. Using chemicals to kill weeds requires exposing the environment, species, and watershed area to a toxic substance which can be the source of further damage to environmental and human health. Manual weed control requires much human effort, machinery, and can cause even more disturbance, leading to erosion, disturbance, and, in some cases, more weeds. The DEIS should carefully consider how invasive plants and weeds will be managed and controlled.</p>
53-4	<ol style="list-style-type: none"> <li>1. Baseline data needs to be collected Pre-construction Identifying species and concentration/distribution.</li> <li>2. Collect seed source from native vegetation before removal and limit removal to the minimum needed.</li> <li>3. Transplant in other areas needing reclamation or make available to other potential users.</li> <li>4. Prevent/control invasive weeds during construction and post construction.</li> <li>5. Reclaim with local native species from seed source. Same species and distribution as before.</li> <li>6. What is the carbon footprint of the native habitat lost?</li> </ol>
55-8	<p>Executive Order 13112, Invasive Species (February 3, 1999), mandates that federal agencies take actions to prevent the introduction of invasive species, provide for their control, and minimize the economic, ecological, and human health impacts that invasive species cause. Executive Order 13112 also calls for the restoration of native plants and tree species. If the proposed project will entail new landscaping, the SDEIS should describe how the project will meet the requirements of Executive Order 13112.</p> <p>Recommendation: The SDEIS should include an invasive plant management plan to monitor and control noxious weeds.</p>
56-4	<p>Will this vegetation be allowed to grow unhindered or will it be treated with herbicide? If herbicide use is contemplated it needs to be a very short lived herbicide.</p>

Comment ID	Comment
30-16	The Mojave Desert is rich in structures and artifacts of significant cultural value that are irreplaceable once lost. A Class III cultural resources survey and report is needed to satisfy the requirements of NEPA and the National Historic Preservation Act. The DEIS should discuss and analyze all impacts to paleontological and Native American cultural resources. Building new transmission lines could cause physical damage to artifacts and sites, expose cultural resources to looters, and could increase fires due to soil disturbance and subsequent weed invasion placing these cultural resources at risk of future damage.

Comment ID	Comment
1-1	Allowing the first solar project in that area will have an negative impact on ohv use, have an adverse economic affect on southern Nevada and the Primm area because of the Primm race track being turned into a solar plant and reduce the recreation areas in southern Nevada.
2-2	The proposed project would produce approximately 400 megawatts of electricity on 13,000 acres of public land currently used about 5 times a year for off road events. I welcome another design and construction project and would love a green hopefully low cost energy source in the area I just want to make sure the area can be shared with the off road users that currently and historically used the area.
6-1	Allowing the first solar project in this area will have a negative impact on OHV use, and also have an adverse economic affect on southern Nevada and the Primm area. The Primm race track being turned into a solar plant would reduce recreation areas in southern Nevada.
9-1	Please do not allow the first solar project in Primm area to have an negative impact on ohv use , the adverse economic affect on southern Nevada and the Primm area because of the Primm race track being turned into a solar plant and reduce the recreation areas in southern Nevada will be huge!
9-2	Nevada has plenty of Sunshine and areas for solar plants but we can only have competitive OHV events on existing race courses and losing the primm track would be devastating to our sport and the economics of the off road and ohv suppliers, vendors, promoters etc.
10-1	Placing the silver state south solar plant in primm or jean is a bad idea . This area has been set aside as a special recreation area for OHV use . This area is a perfect place for OHV use as the soil is sand and decomposed granite based, unlike the north of Las Vegas that has an high alkali based soils that cause dust and erosion with OHV use . Over the past 14 years OHV users have lost over 2,000,000 acres of land to recreate on in Clark county with no new areas opened up to replace them .
13-3	Secondly it is a city that supports a thriving tourism industry, and approximately 40 million domestic and international travelers will also be impacted by these projects. I have a unique perspective and concern on these projects as this is one of our main areas of operation. Closing any part of this area would be ludicrous as this area is one of the most used areas for the Las Vegas, Domestic and International off Road Community. We have had 50 years of racing venues in the area, We have continued use from the general public on a daily basis.
20-2	Is the BLM going to look into mitigation for loss of recreation habitat for this project?
22-3	Would that be written in at the beginning of this (the EIS) that that (public access) cannot change?  That any closures, the closures that are there that exist in the opening stay that way?
24-2	We've been racing here for 25, 30 years. I've been racing here when I was 14 years old I raced out here. And your proposal is going to take away our land.  What I see is usually our government or a company like yours comes in and they go, We'll work with you, no problems. We're going to let you have your events, no problems. But a year from now when I start running 800 horsepower trucks and cars by there, and rocks start flying and they start breaking things or the dust gets here, somebody is going to say, You've got to stop. And that's what happens, then we're stopped and we can't go there anymore.  What you have right now is you've got one corridor that goes up through Calvada, through Calvada wash and around, but that proposed course, I told you earlier, was right on top of an old Edison line that we have a race coming up, we just proposed a race there for a March of next year. We have a race here coming up December 2nd.

Comment ID	Comment
24-5	<p>Well, judging and looki ng and looking at the markers that I've looked at out there, they've pretty well landlocked and taken away the Roach Lake portion for any kind of off-road racing over there. And I can tell you right now, people can tell me all day long, I don't have a problem, we'll find a corridor for you. Once again, when you take 200, 300 high horsepower cars and trucks and run them through there, you've got a problem. They're going to have a problem with it.</p> <p>If somebody wants to give us a letter that says for the next 20 years we won't say anything, no problem, but it won't happen. It isn't going to happen. Whoever runs the company is going to go, No way, we're not going to sign a letter like that. That will shut off racing in Southern Nevada as we know it right now if that project goes in.</p> <p>A couple of things. When Daryl is talking about your washing them, that's because wherever you got them already, there is no off-road racing of cars and trucks. Come out here, I invite you to come here December 2nd, watch the racing and you will go, oh, my God, there's no way we can have this.</p> <p>We went through this experience with the ones in Eldorado Valley and the same thing, I sat at the meeting and listened to the man say, No problem. Three or four months later, Sorry, your race can't come through anymore. Now we can't go into Eldorado Valley anymore because of the panels.</p> <p>Well, you know, once again, sir, I'm not trying to pick on you but in my background, my history, I've seen this happen a hundred times. We're going to work with you, we're going to work with you, we're going to work with you. You won't affect us. And then pretty quick, Hey, you guys can't be here anymore, we've got to stop this, and you just close down all the corridors right here.</p> <p>Once again I proposed routes for a March race right through your lines right there, and we get anywhere near you within a mile or two, you've got a problem. I guarantee you there will be a problem with the dust, just the dust, not to mention rocks, debris flying off the cars. Pit access. We have a proposed pit right there on the edge of Roach dry lake. You're talking 4, 500, maybe 700 vehicles going in and out of there across the public access at the end of the NDOT right-of-way across the railroad tracks there, the county right-of-way. There's a big impact.</p>
32-1	<p>As an avid off roader, I am saddened to hear that even more of our public lands are proposed to be taken away. Public lands should not be sold off to corporations, for any reason. These lands are used by many for all types of recreation, and it would be a shame to lose them. I uderstand the demand for alterative energy, but why would a project that requires 2900 acres be allotted 13,000+? I understand that there needs to be a compromise, but why is it that the tax paying public who actually use these lands is always the one being taken from?</p>
33-2	<p>Taking 13000 acres is not only damaging to our family becau se we enjoy using our desert it will also damage the profits of the local casino's. We pride ourselves on keeping our kids out of trouble and continuously giving them something positive to do to not only better them but our communities as well. I grew up around desert racing and OHV time. I personally can say it has changed my life by keeping me out of trouble when I was a youth.</p>
34-1	<p>It will be terrible if those solar plan s go through. My family and I race in that area and that will cause a huge loss to the off road community. We spend lots of money to be able to run our race cars and I'm sure there is plenty of land out there not set a side (sic) for off road use that the solar plant could be on. So, please reconsider the area choice. please do not take our Primm track a way from us. My family and I do not want to travel to Mexico to do the sport we love and we want to spend our money here in the sates (sic) keeping money here in the states.</p>
37-1	<p>I am an avid off road race enthusiast. I hate Las Vegas, I am not a gambler o r any of the things that place is famous for. However as a result of the off road racing events at Primm, I spend 90% of my annual recreational income in Clarke (sic) County. If you build this solar plant and I will have no reason at all to come from California and spend my money in your state.</p> <p>I am not the only one. As a result of me racing my 2 cars I bring 15-20 people to support me who also spend money in Nevada. At some of the races I attend at prim (sic) there are 200 vehicle entries. I guess the point I am trying to make is that a lot of people visit this are for recreation.</p>

Comment ID	Comment
38-1	<p>This letter is to express my interest in keeping open desert recreation lands and BLM lands for tax paying citizens for recreation purposes.</p> <p>These attempts to steal land paid for by tax payers for recreation have gone too far. It needs to stop now.</p>
39-1	I strongly object to the closure of 13,043 acres of land for solar use. My family uses that land almost every week end to ride our motorcycles. We have been riding out there since 1963 and it is very much a part of our lives. 13,043 acres seems excessive. Please do not approve of this.
40-1	PLEASE don't allow the solar company to take our land that we as a family use to race on. It would be a travesty if my son isn't allowed to race on the same land that I raced on.
41-1	BLM, what's your problem. Racers can't race in the desert for ruining the wildlife, BUT, someone wants to use the desert for a CONSERVATION effort, and let's role out the red carpet. I despise what you are doing and where your associates and all involved are installing these solar advancements
42-3	The proposed land is enjoyed by many people throughout the year that enjoy recreation of all types and the approval of the First Solar project would impact the rights to openly use this land.
44-6	BLM lands are necessary for the preservation of biological diversity, and for primitive recreation which cheaply improves health both physical and psychological. Extractive and exploitative uses must not be prioritized over these vital necessary uses.
46-1	It is our opinion that the proposed "First Solar South Project" near the Nevada/California state line and near the town of Primm, will take away from land which historically has been utilized for off road recreation, sanctioned desert events, and other outdoors recreation. The closure of these areas, without adding other areas which are specifically designated for those uses is not acceptable to those of us who live, work, and recreate in the Southern Nevada area. Over the last several years, I have noticed a concerted effort by certain people within the BLM, the US Forest Service, the federal Fish and Game departments, and other governmental and private organizations, to severely limit the use of off highway vehicles in much of the desert surrounding the city of Las Vegas, Nevada. In addition, it has become more expensive, and more problematic to obtain permits, and to perform all the adjunctive activities which are required by the BLM and other agencies involved in the pursuit of organized desert events. We have been assured by BLM personnel in the past that our continued use of the desert is assured, however the conversion of public land to private land in this area will of necessity stop virtually all off-road use in that area, and will cause the cessation of all sanctioned desert events in that area. This is unacceptable, and I protest this project, and others like it, in the strongest possible way, not because there is no value to it, although that is very questionable from a purely economic point of view, but because it will essentially close this public land to public use, WITHOUT commensurate lands being made available for sanctioned desert event use elsewhere in that area.
54-2	The Silver State Solar Power South Project is located in a BLM LV District SRMA. Within this SRMA there are an abundance of SRPs issued annually such as Race, Tour, Non-competitive trail rides, etc. SRMA's are important and are recognized as having standing and statu. We need to keep single use right of ways (i.e. solar and wind) which restrict or close off access out of current standing SRMA's. SRMA's should be represented for there (sic) multi-use classification and their current RMP's should not be re-amended to allow single use right of ways within its boundaries.

Comment ID	Comment
1-1	Allowing the first solar project in that area will have an negative impact on ohv use, have an adverse economic affect on southern Nevada and the Primm area because of the Primm race track being turned into a solar plant and reduce the recreation areas in southern Nevada.
3-2	We spend tens of thousands every year in Primm. With no long distance races based there, I will never go there again.
5-1	We have been racing in primm for years, selling OHV areas would cause an economic loss at all the hotels and gas stations that multiple people use for gas and food/beverages.
6-1	Allowing the first solar project in this area will have a negative impact on OHV use, and also have an adverse economic affect on southern Nevada and the Primm area. The Primm race track being turned into a solar plant would reduce recreation areas in southern Nevada.
7-2	What would be wrong with putting them anywhere else that would still work with your need and our needs that you guys are trying to do and also leave room for the race cars to have a place to race in Primm so we can keep that town up and running seeing that we bring in a ton of revenue to primm every time a race is held and it sells out all three casino rooms plus the money we pay for food drinks and game play.
8-2	The local desert surrounding Primm, is one used for many activities, including Off Road Racing, which brings a great deal of revenue to the area from all over California, Arizona, Nevada, and many other states as well.
8-3	While I can certainly see the need for more power generation, I absolutely do not see the need to displace an entire industry of manufacturers, race promoters, hobbyist and the like, when there are a great deal of other locations to build said facility.
9-1	Please do not allow the first solar project in Primm area to have an negative impact on ohv use , the adverse economic affect on southern Nevada and the Primm area because of the Primm race track being turned into a solar plant and reduce the recreation areas in southern Nevada will be huge!
9-2	Nevada has plenty of Sunshine and areas for solar plants but we can only have competitive OHV events on existing race courses and losing the primm track would be devastating to our sport and the economics of the off road and ohv suppliers, vendors, promoters etc.
11-1	I am opposed to the construction of this proposed PV plant near Primm. The cost to construct and operate this plant is considerably more than a conventional fossil fuel or nuclear power generating plant. The cost per KW of power produced makes this plant an irresponsible and costly experiment. Non-subsidized projects by private industry should be the focus of solar power generation, not taxpayer money, particularly in this challenging economic time, when extracting taxpayer dollars from a hurting populace makes no sense. When solar generation becomes viable and cost effective, it will take its place in the power options of this country and the world. Trying to force a square peg in a round hole at taxpayer expense serves no purpose other than to make some tree huggers happy and provide temporary employment in a non-viable industry. Leave power R&D to private power companies who will do so competitively, not with a "cost is no object" philosophy.
13-3	Secondly it is a city that supports a thriving tourism industry, and approximately 40 million domestic and international travelers will also be impacted by these projects. I have a unique perspective and concern on these projects as this is one of our main areas of operation. Closing any part of this area would be ludicrous as this area is one of the most used areas for the Las Vegas, Domestic and International off Road Community. We have had 50 years of racing venues in the area, We have continued use from the general public on a daily basis.
13-4	We also have several tour companies that use this area for commercial use on a daily basis and rely on this area for there sole means of income.

Comment ID	Comment
19-2	Any of this money that goes to the U.S. Treasury, is there any clause in there that has a portion of this money go back to the state where this particular project resides? I'd like to see some money to come back to the state of Nevada.
33-3	This project will also hurt the state line economy. Those ho tels look forward to the races because it boosts their economy. They count on these races and racers to help out in the \$\$\$ book. Closing that area down will certainly damage them and possibly close one or two of them. I realize Im just a small voice and dont have the \$\$\$\$ as these solar companies have but please consider what a yes vote will do to all involved.
34-1	It will be terrible if those solar plan s go through. My family and I race in that area and that will cause a huge loss to the off road community. We spend lots of money to be able to run our race cars and I'm sure there is plenty of land out there not set a side (sic) for off road use that the solar plant could be on. So, please reconsider the area choice. please do not take our Primm track a way from us. My family and I do not want to travel to Mexico to do the sport we love and we want to spend our money here in the sates (sic) keeping money here in the states.
35-1	Just wanted to let you know I dont sup port this grab of our public Land. Land that has ben (sic) used for years and years as a place for OHV and Offroad Racing. I hope this is not pushed through as this would be another huge hit to the community of Ohv users (sic) . I mean how can you go and take the land that holds the biggest offroad race of the year bringing over 400+ entrys in buggys and trucks. Think of how many people come as just support for those vehicles lets alone fans. This is just plain wrong alsto (sic) writing my congressmen abought (sic) this. We should have a say in what happens to OUR public land.
36-3	We spend a lot of money there, and it would hurt the community if we were taken out of the equation.
37-1	<p>I am an avid off road race enthusiast. I hate Las Vegas, I am not a gambler o r any of the things that place is famous for. However as a result of the off road racing events at Primm, I spend 90% of my annual recreational income in Clarke (sic) County. If you build this solar plant and I will have no reason at all to come from California and spend my money in your state.</p> <p>I am not the only one. As a result of me racing my 2 cars I bring 15-20 people to support me who also spend money in Nevada. At some of the races I attend at prim (sic) there are 200 vehicle entries. I guess the point I am trying to make is that a lot of people visit this are for recreation.</p>
38-1	<p>This letter is to express my interest in keeping open desert recreation lands and BLM lands for tax paying citizens for recreation purposes.</p> <p>These attempts to steal land paid for by tax payers for recreation have gone too far. It needs to stop now.</p>
52-4	We also recognize that renewable energy development can help create jobs in communities that are eager for them, because of the current economic situation. For these and other related reasons, our organizations are working with regulators and project proponents to move properly sited renewable energy projects forward.
53-8	Address education as mitigation Interpretation, outreach, existing programs, grants?

Comment ID	Comment
30-14	Soil erosion on low fill slopes and steeply graded areas could result in sedimentation of water bodies. Changes in hydrology and soil movements may impact rare plants and habitats for sensitive species, and may impact burrowing species such as the desert tortoise.



Comment ID	Comment
16-2	It (the RMP amendment) raises a question about folks that may not be so inclined to support a recreation management area continued existence as opposed to a solar facility. Seems like apples and oranges but...
17-3	<p>Because the state line runs immediately adjacent to this project, on the California side of that line is desert wildlife management area. Biologically there's no difference between your side and the California side there. It's the same stuff.</p> <p>But the BLM in California and the BLM in Nevada don't seem to talk to each other. Are we going to see a comprehensive management plan for the Ivanpah Valley come out of this as to how we're going to deal with biological resources in that area and not have it piecemealed between the two states?</p>
30-2	This location was proposed for inclusion within a desert tortoise conservation area in the United States Fish and Wildlife Service's original 1994 Desert Tortoise (Mojave Population) Recovery Plan underlining the ecological importance and environmental sensitivity of the project site. Because of the sensitivity of this site, the BLM must make a good faith effort to consider alternative sites for this proposed power plant.
30-4	In 2009, the Las Vegas Field office embarked on revising the Las Vegas RMP. Western Watersheds Project submitted scoping comments on February 28, 2010. In our comments we proposed that the BLM consider "an alternative that expands the boundaries of the Piute El Dorado Area of Critical Environmental Concern to match the proposed Desert Wildlife Management Area ("DWMA") mapped in figure 9 of the 1994 Desert Tortoise Recovery Plan (see attached map). This will establish connectivity between the Primm and Ivanpah Valleys and ensure gene flow..." The 13,043 acres being eyed by Silver State Solar, LLC in its application lies in this important area. The BLM must consider the massive impact that this project will have on the Las Vegas RMP revision planning process and consider delaying further processing of the project pending completion of the Las Vegas RMP revision.
30-17	These public lands are close to Mojave National Preserve and designated Wilderness. The DEIS should fully review the impacts of each alternative on visual resources including the effects on wilderness character and values.
30-18	The proposed project site is close to the South McCullough WSA. Because the project may affect the local water table, may affect wildlife movements, may result in the displacement of ORV users onto WSA lands, and may result in light pollution the project may still impair the wilderness character of the WSA. These direct and indirect impacts to wilderness character need to be analyzed.

Comment ID	Comment
50-8	<p>In accordance with the Interim Rule amending 43 C.F.R. Parts 2090 and 2800, BLM temporarily segregated the lands within the proposed ROW boundary from location under the public lands laws, including the Mining Law of 1872, for a period of up to two years. In its legal description of the segregated lands, BLM included Sections 14 and parts of Sections 27 and 34 of T.26S, R.59E, as well as parts of Sections 3, 9, and 10 of T.27S, R.59E. We note, however, that in October 2002, pursuant to Public Law 107- 282, these lands were already withdrawn from entry under the mining laws and from operation under the mineral leasing and geothermal leasing laws. They are to remain withdrawn until the Secretary terminates the withdrawal or the land is patented.<sup>14</sup> Thus, the SEIS should reflect accurately the special status of the land in the Overlay District, e.g., that even after the temporary segregation expires, lands within the Overlay District will continue to be withdrawn from entry under the mining or mineral leasing laws.</p> <p>Because approval of the First Solar South Project ROW application will require an amendment to the Las Vegas Resource Management Plan (RMP), BLM must also study the impacts associated with an RMP amendment that would allow for different land and resource uses within the Jean Lake/Roach Lake Special Recreation Management Area (SRMA). Concurrently, the BLM Las Vegas Field Office (LVFO) is in the process of revising the RMP in its entirety.<sup>15</sup> In that regard, it is curious that the Notice of Intent (NOI) for the First Solar South Project and Associated RMP amendment makes no mention of the pending revision of the entire RMP. BLM guidance requires that when an RMP is amended pursuant to a project-specific application during an on-going RMP revision process, BLM must consider the effect of amending the RMP on the on-going RMP revision process, including an~ "ripple" effect on the RMP revision analysis created by the project-specific amendment. CCDOA urges BLM to coordinate its analysis for the RMP revision accordingly. Further, because the SNSA Overlay District and flood control lands are currently encompassed within the Jean Lake/Roach Lake SRMA, we request that BLM consult with CCDOA regarding any change in designation in the current SRMA boundary that could potentially impact the construction or operation of the SNSA, including its flood control facilities.</p>
51-4	<p>A conservation alternative as proposed herein and in our scoping comments to the BLM on the Stateline project could be realized easily by implementing the October 2011 nomination by Basin and Range Watch, Desert Protective Council, and Desert Tortoise Council for an Ivanpah Valley Area of Critical Environmental Concern (ACEC) to protect unique biological, cultural, and visual resources. The nomination was submitted to District Field Managers Raymond Lee and Mary Jo Rugwell in recognition of the overlapping responsibilities of their respective offices. BLM Needles and BLM Las Vegas should pursue a coordinated approach to address the cumulative impacts of existing and planned developments in the Ivanpah Valley in order to ensure the survival and well-being of the desert tortoise and other wildlife. The ACEC nomination provides an initiative around which BLM California and BLM Nevada may proactively plan regional conservation of tortoises and other important resources. The Council, of course, would be pleased to assist the BLM to promote healthy tortoise populations through designation of an Ivanpah Valley ACEC.</p>
52-14	<p>Furthermore, in the subsequent 6/10/2011 biological opinion for the Ivanpah SEG, which is described as replacing the 10/1/2010 version, FWS included revised conservation recommendations:</p> <ul style="list-style-type: none"> <li>· We recommend that the Bureau amend the necessary land use plans to prohibit large-scale development (e.g., solar energy facilities, wind development, etc.) within all remaining portions of the Ivanpah Valley to reduce fragmentation within the critical linkage between the Ivanpah Critical Habitat Unit and the Eldorado Critical Habitat Unit.</li> <li>· We recommend that the Bureau consider alternative configurations for this project and the First Solar-Silver State Project that would focus ground disturbance on lands closer to Ivanpah Lake that are likely to have fewer desert tortoises and are less crucial to population connectivity.</li> </ul>
54-2	<p>The Silver State Solar Power South Project is located in a BLM LV District SRMA. Within this SRMA there are an abundance of SRPs issued annually such as Race, Tour, Non-competitive trail rides, etc. SRMA's are important and are recognized as having standing and status. We need to keep single use right of ways (i.e. solar and wind) which restrict or close off access out of current standing SRMA's. SRMA's should be represented for their (sic) multi-use classification and their current RMP's should not be re-amended to allow single use right of ways within its boundaries.</p>

Comment ID	Comment
12-4	Native species (plants and animals) how are they going to be preserved? Bio/habitat.
15-4	<p>I'm concerned about this project for obvious reasons. I mean, I have desert tortoise surveys, done all these, tell us exactly what numbers are out there.</p> <p>And that's a lot of desert habitat. I understand better alternative for the desert tortoise because it's an area that they don't have large numbers. But that first alternative that Silver State Solar, that's very good habitat and I think everybody is realizing that.</p> <p>So that's the rate. I just have a few more things, since you don't have any others. But anyway, as far as the BLM alternative is -essentially still have a large chunk of land eluvial span across the mountains, to me that looks like a very good desert tortoise connectivity zone.</p> <p>Couple of generation's worth of time, like a few decades, more tortoises will not colonize that area. It will become bare.</p> <p>The Carter Project down near Barstow, California is a good example of that. It now has a better number of nearby critical habitat that was designated 20 years prior to that.</p>
15-7	We're working with a botanist and he's identified several rare plants on that site, on the Silver State North side.
21-1	I have a question regarding the biological resources. Do you have any idea yet what the density of the desert tortoise is?
21-2	And I'm also concerned about the penstemon albomarginata, i.e., don't know if there's any in that area but could potentially be. So what do you know about biological resources?
26-1	the Clark County Multiple Species Habitat Conservation Plan (MSHCP) mitigates for the impacts of an Endangered Species Act Section 10(a)(1)(B) incidental take permit by funding a variety of mitigation actions, including actions on Bureau of Land Management (BLM) lands and other federal lands. The subject project will include new permanent disturbance in areas where the MSHCP has funded mitigation actions in support of our incidental take permit.
26-2	In the EIS and Record of Decision (ROD) for the related Silver State Solar Energy Project (N-085077 2800 (NVS3100)), we did not find an assessment of the direct, indirect and cumulative impacts that the project would have on areas where MSHCP actions have been funded. These areas include, at a minimum, the areas noted in our letter addressed to you dated July 14, 2010 (see attached). We request that the BLM address this issue in the subject analysis and use the Supplemental EIS opportunity to analyze these impacts for the entirety of the Silver State Solar Project, including those areas addressed by the prior EIS (N-085077 2800 (NVS3100)) and the subject Supplemental EIS, and to recommend appropriate mitigation for the permanent loss of MSHCP mitigation areas.
26-3	<p>Also, we have updated our analysis of the new areas addressed by the SEIS, and have found the following potential species impacts that should be analyzed in the SEIS:</p> <ul style="list-style-type: none"> <li>known occurrences of Penstemon albomarginatus within the northern portion of the Right of Way Boundary area depicted on the attached First Solar map.</li> <li>areas modeled as potential Penstemon albomarginatus or Penstemon bicolor habitat using an updated rare plant habitat model generated by the BLM Las Vegas Field Office in August 2011</li> </ul>

Comment ID	Comment
27-1	<p>We did not find that the DEIS analysis incorporated an assessment of the direct, indirect and cumulative impacts of the proposed project on areas where MSHCP mitigation actions have been funded. These areas include, at a minimum:</p> <ul style="list-style-type: none"> <li>• Within the Jean Lake, Roach Lake and McCullough Mountains grazing allotments, at costs of \$99,008.33, \$7,014.71, and \$154,859.18, respectively.</li> <li>• Areas where Clark County funds have provided for weed monitoring and treatment activities, including the Interagency Weed Sentry Project.</li> <li>• Areas where Clark County funds were provided to the Nevada System of Higher Education to study the white-margined penstemon (<i>Penstemon albomarginatus</i>) and its habitat.</li> </ul>
30-1	<p>Unfortunately, the proposed location of the First Solar South project is on resource-rich public land making it a very poor choice of site for a power plant project. The First Solar South power plant project including a photovoltaic solar plant and associated facilities would occupy 13,043 acres of federal land managed by the Bureau of Land Management (BLM). The project would be located on relatively undisturbed public lands that provide high quality habitat for the listed desert tortoise, and if approved would have significant direct, indirect and cumulative impacts on desert tortoises and their habitat, rare plants, ground water, and visual resources.</p>
30-6	<p>The proposed project area is good to excellent quality desert tortoise habitat that supports a remarkably high desert tortoise population. The NEPA/CEQA documents should provide quantitative data, and describe, characterize and identify the desert tortoise population that will be impacted under each alternative to assure that NEPA's requisite "hard look" at the environmental effects is taken.</p> <p>The impacts from this project to federally-listed desert tortoises will be direct, indirect, and cumulative. These impacts include habitat loss; habitat disturbance; fragmentation of habitat; fragmentation of populations; decreased viability of fragmented populations; loss of connectivity; potential increases in predators such as ravens and coyotes; introduction, establishment and spread of invasive plants and weeds; increased fire risk; increased human presence; and increased use of roads.</p> <p>The proposed project and the other projects proposed in the area may result in the need for large-scale translocation of desert tortoises. BLM Handbook 1745 - Introduction, Transplant, Augmentation, and Reestablishment of Fish, Wildlife, and Plants - requires that "Decisions for making introductions, transplants, or reestablishments should be made as part of the land use planning process (see BLM Manual Section 1622). Releases must be in conformance with approved RMPs. BLM Handbook 1745 requires that activity plans for translocations must be site specific and include "Site-specific and measurable vegetation/habitat population objectives which are based on existing ecological site potential/condition, habitat capability, and other important factors." Any proposed translocations should ensure that tortoises remain in the same genetic unit, in this case the Ivanpah or the South Las Vegas population. The BLM must include a detailed translocation plan for the project in its NEPA documentation.</p> <p>The proposed project site is important, occupied desert tortoise habitat. Results from prior surveys show that the proposed project area supported relatively high tortoise densities. Detailed surveys are required to determine the number of tortoises that would be impacted. The DEIS should also consider the status of the tortoises in the affected genetic unit.</p> <p>Use of the proposed project site may compromise connectivity between the Ivanpah Valley desert tortoise and the El Dorado desert tortoise populations. For example, in her study on ecological genetics of desert tortoise Hagerty (20082) identified important "least-cost pathways" through the project area that provide connectivity within the South Las Vegas population. Disruption of this connectivity could reduce gene flow and severely impair desert tortoise recovery, and must be addressed in the DEIS.</p>
30-9	<p>There are a number of rare plants and other sensitive animal and plant species found in the area. The DEIS should provide detailed vegetation and wildlife maps to facilitate public input into the process. The DEIS should carefully consider and analyze potential impacts to all species that would be affected by the project, and must include due consideration of alternatives that would minimize those impacts.</p>
42-4	<p>The environmental impact on the raw land that is home to many animals would also be devastating. How many turtles will be killed during construction?</p>

Comment ID	Comment
43-2	<p>Second, this project could have negative effects on endangered and sensitive species. Not only will this project adversely affect wildlife, but also it could hinder the future recovery of species of concern by destroying currently intact habitat. The project borders the Ivanpah DWMA, which is critical habitat for the desert tortoise. The project will cut off a corridor for tortoise movement and most likely will require the movement or killing of hundreds of desert tortoises, the evidence of which is the ordeal of the BrightSource project.</p>
44-1	<p>The area impacted is an area of unusually diverse species, a core area for preservation of diversity, and thus vital for restoration of threatened and endangered species in the Mojave.</p>
51-1	<p>We concur with the BLM's assessment in its Notice of Intent that key issues relative to Silver State South include impacts to threatened and endangered species. There is no more important issue to consider, in our view, than the direct and indirect impacts of the proposed project to the Federally-threatened desert tortoise (<i>Gopherus agassizii</i>) and the cumulative impacts of this and other developments to this unique species and its habitat in the Ivanpah Valley.</p> <p>The Council is deeply concerned about the significant adverse impacts to desert tortoises from the Ivanpah Solar Electric Generating System (ISEGS) and the Silver State North solar projects already under construction on nearly 3,582 and 618 acres, respectively, of what was once high quality, occupied habitat. The Stateline project proposed by First Solar (some 2,200 acres) and the Silver State South solar project (with an estimated 4,000 acre footprint) would expand the destruction of desert tortoise habitat to over 10,000 acres. The remaining habitat will be seriously fragmented. Together, the four solar projects threaten the survival of the Mojave desert tortoise as a viable population in the Ivanpah Valley.</p>
51-2	<p>The Council's concern is heightened by evidence from ISEGS that the desert tortoise population in the Ivanpah Valley is large and reproducing at a healthy rate. There may be as many as 141 sub-adult and adult tortoises, 860 smaller tortoises, and 434 eggs and hatchlings on the ISEGS site, according to the U.S. Fish and Wildlife Service (2011a). Of added importance are USFWS calculations of the number of tortoises resident in the larger area affected by ISEGS. Figuring in the number of tortoises already occupying translocation sites, USFWS estimates that ISEGS could negatively impact as many as 532 adult tortoises, 3,236 smaller-class individuals, and 1,631 eggs or hatchlings. Moreover, as USFWS estimates, there may be an additional 3,867 adult tortoises in the remaining portions of the action area. The numbers and reproductive capacity of the Ivanpah tortoises are especially important given the absence of a stable, recovered population elsewhere in the Mojave Desert.</p> <p>As defined in the 1994 Desert Tortoise (Mojave Population) Recovery Plan, the Ivanpah Valley was within the Northeastern Mojave Desert Tortoise Recovery Unit, one of six designated evolutionary significant units. This population was understood to be genetically the most distinctive unit of the desert tortoise in the Mojave Desert, and Northeastern Mojave desert tortoises were recognized as the most genetically distinct population of California's tortoises.</p> <p>The Revised Desert Tortoise Recovery Plan (2011) reduced the number of recovery units from six to five and changed some of the 1994 recovery units boundaries, with the result that the Ivanpah population is now classified by USFWS as part of the Eastern Mojave Recovery Unit.</p> <p>Based on an analysis of genetic data and without apparent political considerations, Hagerty, in her Ph.D. thesis "Ecological Genetics of the Mojave Desert Tortoise" (2008), identifies the Ivanpah population of tortoises as part of the South Las Vegas unit, a genetically distinct subpopulation. Hagerty and Tracy, in their peer-reviewed publication in Conservation Genetics (2010), again identify the Ivanpah desert tortoises as part of the genetically distinct South Las Vegas subpopulation.</p> <p>Silver State South could adversely impact up to 4,000 acres of this large and distinct subpopulation through the destruction of quality desert tortoise habitat. The project, in addition, will fragment and disrupt the habitat connectivity required to maintain genetic flow that is essential to ensuring self-sustaining populations of desert tortoises located north and south of the proposed project. Tortoises, particularly subadults, will travel great distances if we protect their habitats and allow them to move freely. Tortoises by themselves will maintain the natural connectivity among population units if we permit them to live and reproduce without human</p>

51-3

The Council feels strongly that the SEIS for the Silver State South project should include an alternative specifically designed to conserve wild desert tortoise populations in the Ivanpah Valley. This alternative should be designated the “preferred alternative.” The conservation alternative should (1) preclude siting Silver State South on any of the 13,043 acres of public lands managed by the BLM that are targeted by First Solar (Silver State Solar, LLC) in its right-of-way application. The conservation alternative should (2) preclude any further development of BLM lands in the Ivanpah Valley by setting aside all those remaining public lands for conservation (with the possible exception of Ivanpah Dry Lake). Similar to this, the Council (2011) proposed that a conservation alternative be incorporated and designed as the “preferred alternative” in the environmental impact statement on First Solar’s right-of-way application for the Stateline project.

The conservation alternative should be the “preferred alternative” as it would give appropriate weight to the Federal mandate to conserve and recover the Federally-threatened desert tortoise by protecting a significant subpopulation of tortoises. The conservation alternative should be the “preferred alternative” as it would protect the expanse of quality public lands managed by the BLM in the Ivanpah Valley as unfragmented habitat.

Since the 1990 listing of the desert tortoise by the Federal government, “desert tortoise habitat has continued to be lost or degraded..., keeping tortoise populations in an insecure state...” (USFWS 2011b, p. 34). In the Ivanpah Valley, there is an opportunity to reverse rather than accelerate the deterioration, fragmentation, and loss of habitat. The conservation alternative would shield (a) lands not designated as critical habitat in 1980 and 1994 but subsequently found to support significant tortoise populations; (b) lands adjacent to critical habitat and for which development would have severe adverse impacts; and (c) lands that serve to connect critical habitat or parts of critical habitat and, in this case, the Mojave National Preserve. Protecting habitat is even more important today as the recent splitting of *Gopherus agassizii* and description of a new species of desert tortoise (*G. morafkai*) reduces the distribution of *G. agassizii* to about 30 percent of its former range (Murphy, et al. 2011).

USFWS recognized the importance of limiting development in the Ivanpah Valley to protect habitat with its Section 7(a)(1) Endangered Species Act recommendations to the BLM on ISEGS. In its initial biological opinion (2010), USFWS urged that BLM amend the California Desert Conservation Area Plan to prohibit any further large-scale, energy facilities within the area bounded by Interstate 15, the California-Nevada stateline, and the Clark Mountains, an area that includes the proposed Stateline project. USFWS advised BLM that “the potential exists that this portion of the Ivanpah Valley may be disturbed and fragmented to the extent that desert tortoises and other wildlife populations may be severely compromised” (2010, p. 63). In its revised biological opinion on ISEGS (2011a, pp. 92-93), USFWS recommended that BLM amend its land use plans “to prohibit large-scale development within all remaining portions of the Ivanpah Valley to reduce fragmentation within the critical linkage between the Ivanpah Critical Habitat Unit and the Eldorado Critical Habitat Unit.”

Given the information in the preceding paragraph, the Council feels that it is imperative that the SEIS fully analyze the BLM’s intent (or failure) to implement these USFWS recommendations. Either the BLM has new information that disproves USFWS’ contention, in which case new data in the SEIS should be presented and analyzed that the loss of an additional 4,000 acres will not seriously fragment critical habitats. Or, in the absence of supporting new data, the Council contends that the BLM is obligated to accept USFWS’ recommendation and reject the proposal to allow construction of this 4,000-acre project. In the absence of new data presented in the SEIS showing that fragmentation would not be significant and deleterious to regional of tortoise populations, the Council feels that BLM must reject this proposed project.

These USFWS recommendations represent a conservation vision that merits recognition and implementation by BLM. If the BLM does not reject this proposed project, the Council believes that USFWS must acknowledge its statements about prohibiting additional large-scale development in Ivanpah Valley, and in so doing, issue a jeopardy biological opinion on Silver State South, a project that will introduce more adverse impacts to this sensitive, important area.

52-5

That said, renewable development is not appropriate everywhere on the public lands and must be balanced against the equally urgent need to protect unique and sensitive resources, such as the threatened Desert tortoise and its habitat. There are many opportunities for development of renewable energy generation and transmission in the West and Southwest, including lands in Nevada, Arizona and California where solar energy resources are abundant, and we believe that the opportunities are sufficient to provide for solar energy development in an environmentally and economically sound manner.

Comment ID	Comment
52-7	<p data-bbox="207 120 2043 243">Unfortunately, the proposed project is located in high quality habitat that is occupied by the threatened Desert tortoise and other sensitive species of plants and animals<sup>1</sup> and, as such, appears to be inappropriately sited. The proposed Project and alternatives would not only destroy habitat but will also significantly increase fragmentation and contribute to the loss of habitat connectivity for the Desert tortoise and other species.</p> <p data-bbox="207 280 2043 435">As mentioned above, we have urged BLM to undertake an ecological analysis of the Ivanpah Valley as a whole before moving forward with the permitting process for individual project proposals. Only by taking a landscape level look at these issues first, without the arbitrarily placed ROW applications as a starting point, can the BLM accurately assess the viability of the population and the areas that are most important to preserve. BLM must ensure that any additional renewable energy projects within occupied desert tortoise habitat in this area, or that increase fragmentation in the valley, will not jeopardize the tortoise population or its future viability in this area.</p> <p data-bbox="207 472 2043 596">BLM is legally required under Section 7(a)(1) of the Endangered Species Act to use its authority to further the conservation (recovery) of threatened and endangered species, which it must carry out here because the Desert tortoise has been listed as a threatened species since 1990. We expect BLM to establish policies that will conserve Desert tortoises and their habitat in the Ivanpah Valley and to ensure that they remain interconnected with populations occurring in the Eastern Mojave and Northeastern Mojave Recovery Units.</p> <p data-bbox="207 633 2043 725">We strongly urge BLM to adopt these conservation recommendations and consider other significantly different alternatives or deny the proposed project in order to ensure that it will not prevent BLM from carrying out its legal obligation to conserve the Desert tortoise within the Eastern Mojave and Northeastern Mojave Recovery Units.</p>



52-8

The alternatives mentioned in the scoping notice show some effort to address these impacts but not nearly enough. Given the enormous impacts of the BrightSource Ivanpah project on the Desert tortoise and its habitat, it is incumbent on BLM and the U.S. Fish and Wildlife Service (FWS) to determine whether the Ivanpah Valley can sustain any further degradation and loss of habitat without irreparable harm to the Desert tortoise populations not only in Ivanpah Valley, but in the Eastern Mojave and Northeastern Mojave Recovery Units, and adversely impact recovery of this declining and threatened species. Lastly, we strongly recommend that BLM review the adequacy of the biological resources survey for the proposed project because there are some species that have a very high probability of occurring on the project area based on their documented occurrence at the Ivanpah SEGS site. Two such species are the Western burrowing owl and American badger, and there are several more.

We have repeatedly asked BLM in both California and Nevada to assess the current and projected ecological conditions in the entire Ivanpah Valley region given the current and projected loss of natural biological communities due to existing, proposed and planned land use projects in this region, including a number of large scale solar projects.

Furthermore, we have advocated that BLM complete such a regional assessment before continuing to process solar energy project applications in either California or Nevada. That analysis should precede and inform any new project proposals and alternative project designs in this area. We strongly urge the BLM to suspend processing of current and future right-of-way applications in the Ivanpah Valley as a whole until the ecological health of the habitat and the conservation needs of the Desert tortoise and other at-risk species are determined in a systematic manner utilizing subject matter experts from the relevant agencies, academic institutions and professional organizations. We do not consider a cumulative effects analysis under NEPA to be substitute for a comprehensive ecological analysis of the Ivanpah Valley region.

We are deeply concerned over the significant adverse impacts to Desert tortoises and their high-quality habitat in the Ivanpah Valley due to the 3,500 acre Ivanpah and the 618 acre Silver State North solar projects that are already under construction. The proposed project and the proposed Stateline solar project in California would expand these impacts by approximately 6,000 acres (Stateline – 2,000 acres; Silver State South – est. 4,000 acres).

High quality, occupied Desert tortoise habitat in the Ivanpah Valley links similar habitat and Desert tortoise populations in the Eastern Mojave Recovery Unit and the Northeastern Mojave Recovery Unit. Even using the new recovery unit boundaries in the revised recovery plan for the desert tortoise, it is clear that this area remains a key connectivity pinch-point between the populations and recovery units. Hagerty et al. (2011) also shows that the Ivanpah Valley is a critical movement corridor for desert tortoise gene flow.

The FWS determined that loss of connectivity in the vicinity of Primm, Nevada would likely create a nearly closed population in the southern end of the Ivanpah Valley, largely due to topographic constraints between Ivanpah Valley and Cima, located in the far southern reaches of Ivanpah Valley. Furthermore, FWS in the Revised Biological Opinion for the Ivanpah SEGS (pp. 75-76), stated:

Although the available information does not support a conclusion that connectivity would be lost in the vicinity of Primm, leading to population-level genetic and demographic effects in the southern end of the Ivanpah Valley, the existing effects of fragmentation caused by the LSTS fence, Interstate 15, Primm, and the Clark Mountains are likely to be exacerbated by the development of the ISEGS facility.

Although culverts and underpasses, north of Primm and west of Roach Lake, and between Yates Well Road and Nipton Road, offer some small potential for population connectivity to this area, we have concluded that dispersal of desert tortoises through these underpasses does not likely contribute significantly to population connectivity. This lack of significant connectivity has resulted in a population west of Interstate 15 that is completely or nearly isolated from the remainder of the desert tortoise population in the southern end of the Ivanpah Valley.

The isolated population west of Interstate 15 is significantly smaller than the minimum viable population size identified in Service (1994), indicating that it is highly vulnerable to demographic stochasticity and genetic deterioration. The development of the ISEGS facility in the area occupied by this isolated population is likely to promote or exacerbate these effects by reducing the area available to this population and introducing additional mortality sources that may reduce population

Comment ID	Comment
52-8	<p>recruitment or create demographic imbalances. The potential mortality of juvenile individuals on the ISEGS project site will also likely have some effects on population recruitment (i.e., individuals reaching reproductive age). In addition to exacerbating demographic and genetic effects within this small population, the ISEGS facility would further fragment the small population west of Interstate 15 by constraining connectivity between populations east and west of the facility. However, because population connectivity would still remain to the north of Unit 3 and BrightSource would install culverts underneath its access road to alleviate fragmentation associated with it, we anticipate that populations to the west and east of ISEGS would still largely be connected.</p> <p>It is clear from the revised biological opinion for the ISEGS project, dated June 10, 2011, that the FWS was concerned about the already compromised and potentially isolated Desert tortoise population occurring west of I-15 in the Ivanpah Valley. Thus, it is essential that BLM, in consultation with FWS, fully analyze and disclose the implications that the proposed project would have on the continued viability of the Desert Tortoise generally east of I-15 and to carefully determine 1) how and where habitat connectivity and gene-flow occurs, and 2) how it can be maintained and enhanced.</p>
52-13	Maintaining habitat connectivity at the landscape level is considered essential in maintaining self-sustaining Desert tortoise populations through gene-flow, providing opportunities for individuals to re-colonize suitable habitats, and maintaining access to potentially suitable habitat due to the effects of climate change.
52-15	BLM in Nevada and California need to pursue a coordinated approach to address cumulative impacts of existing and planned developments, but, even more importantly, a sufficiently robust habitat conservation strategy for the entire Ivanpah Valley. Such a strategy should address recovery of the Desert tortoise through sustained habitat protection and necessary habitat enhancements, such as highway fencing, culverts or other devices to provide for movements of individuals, maintaining gene flow and elimination of unnecessary impediments to connectivity in both California and Nevada.
53-3	Baseline data needs to be collected Pre-construction on the existing population and impacts from Bright Source and Phase 1 of Silver State South. Translocation should be addressed.
53-4	<ol style="list-style-type: none"> <li>1. Baseline data needs to be collected Pre-construction Identifying species and concentration/distribution.</li> <li>2. Collect seed source from native vegetation before removal and limit removal to the minimum needed.</li> <li>3. Transplant in other areas needing reclamation or make available to other potential users.</li> <li>4. Prevent/control invasive weeds during construction and post construction.</li> <li>5. Reclaim with local native species from seed source. Same species and distribution as before.</li> <li>6. What is the carbon footprint of the native habitat lost?</li> </ol>

55-7

The SDEIS should identify all petitioned and listed threatened and endangered species and critical habitat that might occur within the project area. The document should identify and quantify which species or critical habitat might be directly, indirectly, or cumulatively affected by each alternative and mitigate impacts to these species. Emphasis should be placed on the protection and recovery of species due to their status or potential status under the federal or state Endangered Species Act. For this project, EPA is particularly concerned regarding potential impacts to desert tortoise and Death Valley ephedra..

Recommendations:

The EPA recommends that the BLM consult with the U.S. Fish and Wildlife Service and prepare a Biological Opinion under Section 7 of the ESA for all threatened or endangered species present, including the desert tortoise. The SDEIS should provide a recent status update of these actions.

The BLM should coordinate across field offices, and with the USFWS as well as state wildlife agencies, to ensure that current and consistent surveying, monitoring, and reporting protocols are applied in protection and mitigation efforts.

Analysis of impacts and mitigation on covered species, such as the desert tortoise, should include:

- Baseline conditions of habitats and populations of the covered species.
- A clear description of how avoidance, mitigation and conservation measures will protect and encourage the recovery of the covered species and their habitats in the project area.
- Consistent monitoring, reporting and adaptive management efforts to ensure species and habitat conservation effectiveness.
- Implementing post-translocation monitoring and adaptive management strategies will be crucial in evaluating the impacts to species and the success rate of the experimental translocation program.

If the applicant is to acquire compensation lands, the location(s) and management plans for these lands should be discussed in the SDEIS. In light of the numerous projects proposed in the Ivanpah Valley, available land to adequately compensate for environmental impacts to sensitive resources may serve as a limiting factor for development.

Recommendations:

Incorporate into the SDEIS information on the compensatory mitigation proposals (including quantification of acreages, estimates of species protected, costs to acquire compensatory lands, etc ... ) for unavoidable impacts to biological resources, such as desert tortoise.

Identify compensatory mitigation lands or quantify, in the SDEIS, available lands for compensatory habitat mitigation for this project, as well as reasonably foreseeable projects in the Ivanpah Valley area. Specify provisions that will ensure habitat selected for compensatory mitigation will be protected in perpetuity.

Incorporate, into the SDEIS, mitigation, monitoring, and reporting measures that result from consultation with the USFWS and that incorporate lessons learned from other solar projects and recently released guidance to avoid and minimize adverse effects to sensitive biological resources.

Discuss mitigation ratios for tortoise habitat and how these relate to the mitigation ratios recommended by other agencies, as well as how they relate to mitigation ratios used for other renewable energy projects in California and Nevada.

The SDEIS should describe the potential for habitat fragmentation and obstructions for wildlife movement from the construction of this project and other utility scale renewable energy projects in the Ivanpah Valley area.

Discuss the need for monitoring, mitigation, and if applicable, translocation management plans for the sensitive biological resources approved by the BLM and the biological resource management agencies. This would include, but is not limited to, an Avian Protection Plan, a Raven Monitoring, Management and Control Plan,

Comment ID	Comment
55-7	<p data-bbox="205 110 2045 168">Burrowing Owl Mitigation, Desert Tortoise Relocation Translocation Plan, Desert Tortoise Compensatory Mitigation Plan, and Special - Status Plant Impact Avoidance and Mitigation Plan.</p> <p data-bbox="205 207 2045 298">The EPA is also concerned about the potential impact of construction, installation, and maintenance activities (deep trenching, grading, filling, and fencing) on habitat. The SDEIS should describe the extent of these activities and the associated impacts on habitat and threatened and endangered species. We encourage habitat conservation alternatives that avoid and protect high value habitat and create or preserve linkages between habitat areas to better conserve the covered species.</p> <p data-bbox="205 337 2045 396">Recommendations: The SDEIS should describe the extent of potential impacts from construction, installation, and maintenance activities.</p> <p data-bbox="205 435 2045 493">The SDEIS should indicate the location of important wildlife habitat areas. The SDEIS should describe what measures will be taken to protect important wildlife habitat areas and to preserve linkages between them.</p> <p data-bbox="205 532 2045 623">The SDEIS should provide detailed information on any proposed fencing design and placement, and its potential effects on drainage systems on the project site. Fencing proposed for this project should meet appropriate hydrologic, wildlife protection and movement, and security performance standards. Those standards should be described in the SDEIS.</p>
56-2	<p data-bbox="205 649 2045 740">It is my understanding that the Desert Tortoise population in the Ivanpah Valley is considered part of the Northeast Mojave subpopulation and is considered a genetically distinct population. The continued fragmentation of habitat in this area of the Mojave Desert may pose a significant threat to the viability of this subpopulation of the Desert Tortoise</p>

Comment ID	Comment
1-1	Allowing the first solar project in that area will have an negative impact on ohv use, have an adverse economic affect on southern Nevada and the Primm area because of the Primm race track being turned into a solar plant and reduce the recreation areas in southern Nevada.
1-2	Nevada has plenty of Sunshine and areas for solar plants but can only have competitive OHV events on existing race courses and losing the primm track would be devastating.
2-2	The proposed project would produce approximately 400 megawatts of electricity on 13,000 acres of public land currently used about 5 times a year for off road events. I welcome another design and construction project and would love a green hopefully low cost energy source in the area I just want to make sure the area can be shared with the off road users that currently and historically used the area.
4-1	It has come to my understanding that a solar project has been proposed in Primm, Nevada. This project will certainly have a negative impact of the OHV use in this area. This area is the best area in Nevada when it comes to OHV use.
5-1	We have been racing in primm for years, selling OHV areas would cause an economic loss at all the hotels and gas stations that multiple people use for gas and food/beverages.
6-1	Allowing the first solar project in this area will have a negative impact on OHV use, and also have an adverse economic affect on southern Nevada and the Primm area. The Primm race track being turned into a solar plant would reduce recreation areas in southern Nevada.
6-2	Nevada has plenty of other areas suitable for solar plants. We can only hold competitive OHV events on existing race courses and losing the Primm track would be devastating, not only for the OHV community, but also for the surrounding Primm Valley.
7-2	What would be wrong with putting them anywhere else that would still work with your need and our needs that you guys are trying to do and also leave room for the race cars to have a place to race in Primm so we can keep that town up and running seeing that we bring in a ton of revenue to primm every time a race is held and it sells out all three casino rooms plus the money we pay for food drinks and game play.
8-2	The local desert surrounding Primm, is one used for many activities, including Off Road Racing, which brings a great deal of revenue to the area from all over California, Arizona, Nevada, and many other states as well.
9-1	Please do not allow the first solar project in Primm area to have an negative impact on ohv use , the adverse economic affect on southern Nevada and the Primm area because of the Primm race track being turned into a solar plant and reduce the recreation areas in southern Nevada will be huge!
10-1	Placing the silver state south solar plant in primm or jean is a bad idea . This area has been set aside as a special recreation area for OHV use . This area is a perfect place for OHV use as the soil is sand and decomposed granite based, unlike the north of Las Vegas that has an high alkali based soils that cause dust and erosion with OHV use . Over the past 14 years OHV users have lost over 2,000,000 acres of land to recreate on in Clark county with no new areas opened up to replace them .
13-3	Secondly it is a city that supports a thriving tourism industry, and approximately 40 million domestic and international travelers will also be impacted by these projects. I have a unique perspective and concern on these projects as this is one of our main areas of operation. Closing any part of this area would be ludicrous as this area is one of the most used areas for the Las Vegas, Domestic and International off Road Community. We have had 50 years of racing venues in the area, We have continued use from the general public on a daily basis.

Comment ID	Comment
13-5	These facilities should be put in California where the power is going to be used such as the Baker or Barstow area in California where there is no off-road or public activity and the expanse of the areas are far greater than the area you are proposing and still next to your power grid.
22-2	<p>If it does go through, can the closures for the OHV community be amended any time after this starts or gets underway?</p> <p>Or the tour companies that operate there?</p>
22-3	<p>Would that be written in at the beginning of this (the EIS) that that (public access) cannot change?</p> <p>That any closures, the closures that are there that exist in the opening stay that way?</p>
24-2	<p>We've been racing here for 25, 30 years. I've been racing here when I was 14 years old I raced out here. And your proposal is going to take away our land.</p> <p>What I see is usually our government or a company like yours comes in and they go, We'll work with you, no problems. We're going to let you have your events, no problems. But a year from now when I start running 800 horsepower trucks and cars by there, and rocks start flying and they start breaking things or the dust gets here, somebody is going to say, You've got to stop. And that's what happens, then we're stopped and we can't go there anymore.</p> <p>What you have right now is you've got one corridor that goes up through Calvada, through Calvada wash and around, but that proposed course, I told you earlier, was right on top of an old Edison line that we have a race coming up, we just proposed a race there for a March of next year. We have a race here coming up December 2nd.</p>
24-5	<p>Well, judging and looking and looking at the markers that I've looked at out there, they've pretty well landlocked and taken away the Roach Lake portion for any kind of off-road racing over there. And I can tell you right now, people can tell me all day long, I don't have a problem, we'll find a corridor for you. Once again, when you take 200, 300 high horsepower cars and trucks and run them through there, you've got a problem. They're going to have a problem with it.</p> <p>If somebody wants to give us a letter that says for the next 20 years we won't say anything, no problem, but it won't happen. It isn't going to happen. Whoever runs the company is going to go, No way, we're not going to sign a letter like that. That will shut off racing in Southern Nevada as we know it right now if that project goes in.</p> <p>A couple of things. When Daryl is talking about your washing them, that's because wherever you got them already, there is no off-road racing of cars and trucks. Come out here, I invite you to come here December 2nd, watch the racing and you will go, oh, my God, there's no way we can have this.</p> <p>We went through this experience with the ones in Eldorado Valley and the same thing, I sat at the meeting and listened to the man say, No problem. Three or four months later, Sorry, your race can't come through anymore. Now we can't go into Eldorado Valley anymore because of the panels.</p> <p>Well, you know, once again, sir, I'm not trying to pick on you but in my background, my history, I've seen this happen a hundred times. We're going to work with you, we're going to work with you, we're going to work with you. You won't affect us. And then pretty quick, Hey, you guys can't be here anymore, we've got to stop this, and you just close down all the corridors right here.</p> <p>Once again I proposed routes for a March race right through your lines right there, and we get anywhere near you within a mile or two, you've got a problem. I guarantee you there will be a problem with the dust, just the dust, not to mention rocks, debris flying off the cars. Pit access. We have a proposed pit right there on the edge of Roach dry lake. You're talking 4, 500, maybe 700 vehicles going in and out of there across the public access at the end of the NDOT right-of-way across the railroad tracks there, the county right-of-way. There's a big impact.</p>

Comment ID	Comment
29-1	Silver State Solar, LLC has indicated that they will coordinate with BLM to establish appropriate site access. It is requested that Silver State Solar, LLC coordinates with Primadonna Corporation about access, if site access is proposed to be through Primm.
29-4	The ROW application indicates that Primm may be subject to noise due to increased traffic volume. It is requested that Silver State Solar, LLC coordinate traffic access with Primm. Information that is important includes: proposed days of work, proposed hours of work, whether site access is expected to be through Primm, number of trips per day, etc.
30-18	The proposed project site is close to the South McCullough WSA. Because the project may affect the local water table, may affect wildlife movements, may result in the displacement of ORV users onto WSA lands, and may result in light pollution the project may still impair the wilderness character of the WSA. These direct and indirect impacts to wilderness character need to be analyzed.
31-1	I recently heard about the solar project that might take 13,000 acres of OHV recreation area land in Primm Nevada. Myself, my family and thousands of other off-road enthusiasts would like you to reconsider this land closure in the Primm area. This area has been used for many years for off-road related events and recreation. Closing this land makes it even harder for families to enjoy the open desert and hurts the economy by making it harder for off-road related businesses to survive.
32-1	As an avid off roader, I am saddened to hear that even more of our public lands are proposed to be taken away. Public lands should not be sold off to corporations, for any reason. These lands are used by many for all types of recreation, and it would be a shame to lose them. I uderstand the demand for alterative energy, but why would a project that requires 2900 acres be allotted 13,000+? I understand that there needs to be a compromise, but why is it that the tax paying public who actually use these lands is always the one being taken from?
33-2	Taking 13000 acres is not only damaging to our family because we enjoy using our desert it will also damage the profits of the local casino's. We pride ourselves on keeping our kids out of trouble and continuously giving them something positive to do to not only better them but our communities as well. I grew up around desert racing and OHV time. I personally can say it has changed my life by keeping me out of trouble when I was a youth.
35-1	Just wanted to let you know I dont support this grab of our public Land. Land that has ben (sic) used for years and years as a place for OHV and Offroad Racing. I hope this is not pushed through as this would be another huge hit to the community of Ohv users (sic) . I mean how can you go and take the land that holds the biggest offroad race of the year bringing over 400+ entrys in buggys and trucks. Think of how many people come as just support for those vehicles lets alone fans. This is just plain wrong alsto (sic) writing my congressmen abought (sic) this. We should have a say in what happens to OUR public land.
36-1	Please consider the needs of the offroad community in your quest for solar power.
37-1	<p>I am an avid off road race enthusiast. I hate Las Vegas, I am not a gambler or any of the things that place is famous for. However as a result of the off road racing events at Primm, I spend 90% of my annual recreational income in Clarke (sic) County. If you build this solar plant and I will have no reason at all to come from California and spend my money in your state.</p> <p>I am not the only one. As a result of me racing my 2 cars I bring 15-20 people to support me who also spend money in Nevada. At some of the races I attend at prim (sic) there are 200 vehicle entries. I guess the point I am trying to make is that a lot of people visit this are for recreation.</p>
40-1	PLEASE don't allow the solar company to take our land that we as a family use to race on. It would be a travesty if my son isn't allowed to race on the same land that I raced on.



Comment ID	Comment
46-1	<p>It is our opinion that the proposed "First Solar South Project" near the Nevada/California state line and near the town of Primm, will take away from land which historically has been utilized for off road recreation, sanctioned desert events, and other outdoors recreation. The closure of these areas, without adding other areas which are specifically designated for those uses is not acceptable to those of us who live, work, and recreate in the Southern Nevada area. Over the last several years, I have noticed a concerted effort by certain people within the BLM, the US Forest Service, the federal Fish and Game departments, and other governmental and private organizations, to severely limit the use of off highway vehicles in much of the desert surrounding the city of Las Vegas, Nevada. In addition, it has become more expensive, and more problematic to obtain permits, and to perform all the adjunctive activities which are required by the BLM and other agencies involved in the pursuit of organized desert events. We have been assured by BLM personnel in the past that our continued use of the desert is assured, however the conversion of public land to private land in this area will of necessity stop virtually all off-road use in that area, and will cause the cessation of all sanctioned desert events in that area. This is unacceptable, and I protest this project, and others like it, in the strongest possible way, not because there is no value to it, although that is very questionable from a purely economic point of view, but because it will essentially close this public land to public use, WITHOUT commensurate lands being made available for sanctioned desert event use elsewhere in that area.</p>
54-2	<p>The Silver State Solar Power South Project is located in a BLM LV District SRMA. Within this SRMA there are an abundance of SRPs issued annually such as Race, Tour, Non-competitive trail rides, etc. SRMA's are important and are recognized as having standing and status. We need to keep single use right of ways (i.e. solar and wind) which restrict or close off access out of current standing SRMA's. SRMA's should be represented for their (sic) multi-use classification and their current RMP's should not be re-amended to allow single use right of ways within its boundaries.</p>

Comment ID	Comment
12-4	Native species (plants and animals) how are they going to be preserved? Bio/habitat.
53-4	<ol style="list-style-type: none"><li>1. Baseline data needs to be collected Pre-construction Identifying species and concentration/distribution.</li><li>2. Collect seed source from native vegetation before removal and limit removal to the minimum needed.</li><li>3. Transplant in other areas needing reclamation or make available to other potential users.</li><li>4. Prevent/control invasive weeds during construction and post construction.</li><li>5. Reclaim with local native species from seed source. Same species and distribution as before.</li><li>6. What is the carbon footprint of the native habitat lost?</li></ol>
56-3	<p>I am also concerned about how sheet flooding of the proposed site will be dealt with, especially as regards the impacts on the bajada downstream from the project site. In order to maintain the health and character of the vegetation downslope from the project there is a need for sheet flooding to occur across the site rather than to channel flood waters into a few major washes.</p> <p>The proponents have stated that they will partially grade and/or disc and then compact the site. How will this affect flood flows? Also, how will the proponent deal with the vegetation that will grow along the drip line of the solar panels. The concentration of rainfall along the panel driplines will have the effect of significantly increasing the natural rainfall in a small area along the dripline and there may be quite significant plant growth in wet years.</p>

Comment ID	Comment
7-1	How is it that you say we are destroying the desert and putting up a ton of eye sore solar panels isn't. I really would hate to have to look at those ugly panels every time I came out to visit Primm or Las Vegas.
12-3	What features are they going to add to minimize visual impacts? Trees?
15-8	Other impact will be visual.· It's very, very large.· You're going to have a visual impact.
30-1	Unfortunately, the proposed location of the First Solar South project is on resource-rich public land making it a very poor choice of site for a power plant project. The First Solar South power plant project including a photovoltaic solar plant and associated facilities would occupy 13,043 acres of federal land managed by the Bureau of Land Management (BLM). The project would be located on relatively undisturbed public lands that provide high quality habitat for the listed desert tortoise, and if approved would have significant direct, indirect and cumulative impacts on desert tortoises and their habitat, rare plants, ground water, and visual resources.
30-17	These public lands are close to Mojave National Preserve and designated Wilderness. The DEIS should fully review the impacts of each alternative on visual resources including the effects on wilderness character and values.
30-18	The proposed project site is close to the South McCullough WSA. Because the project may affect the local water table, may affect wildlife movements, may result in the displacement of ORV users onto WSA lands, and may result in light pollution the project may still impair the wilderness character of the WSA. These direct and indirect impacts to wilderness character need to be analyzed.
43-3	In addition, this project will impact the outstanding visual resources of southern Nevada. One of Nevada's major assets is its stunning open spaces, which bring tourism and revenue to local communities. The First Solar proposal will severely harm this treasured landscape.
53-6	<ol style="list-style-type: none"><li>1. Establish baseline data for light reaching both the park's Clark Mountain unit and the Ivanpah Mountains.</li><li>2. During construction limit or exclude night work, use lighting focused on work areas.</li><li>3. Post construction no night lighting, or lighting that is shielded and preferably lighting only activated by motion detectors and on only when needed.</li></ol> <p>Need to minimize view from the preserve. Line and color contrast needs to be analyzed and mitigated.</p>

Comment ID	Comment
17-2	So when you do that, when you move it right up against the slope of the Lucy Grays, that increases flood problems. And can you just address how you will address -- can you address how you will deal with flows out of those washes and sheet flooding across this project? And if you intend to put tortoise fencing around it, how is that going to be affected by floods?
18-4	<p>With all these solar plants going in, can that whole area sustain all this water that's going to be used? Every plant and every solar plant going in saying, oh, we're only going to use a little bit amount.</p> <p>That's going to take a lot of water, because I know, to keep the dust down.</p> <p>How deep are those wells going to get water? How far do you plan on going?</p>
25-1	<p>I want to go back to the dust issue. And let's answer that again. You said two times a year those panels are cleaned and they go through a maintenance process; is that correct?</p> <p>What's the cost of cleaning those panels? Have you guys determined that, oh, now is the time to clean them, how effective is the cost? I mean, is it a big deal or is it pretty simple, pretty quick and cost effective just to do it?</p>
29-3	<p>The projected water demand when the system is in operation is 15 acre-feet per year. The ROW application does not indicate the projected water demand during construction. It is requested that Silver State Solar, LLC include in the Plan of Development, or provide to Primadonna Corporation, information on the source water during construction, if it will be via groundwater. The information that is requested includes quantity of water for the entire construction period, annual maximum extraction, and wellhead location. A detailed groundwater effects evaluation is requested from Silver State Solar, LLC on groundwater extraction and water quality during the construction period, including the effect on Primm's existing permitted water rights and associated wells.</p> <p>Primm has concerns that stormwater drainage patterns from the proposed project will be altered to negatively affect Primm property. It is requested that Silver State Solar, LLC complete flood control evaluations to demonstrate that no negative affect shall result from the proposed project .</p>
30-1	Unfortunately, the proposed location of the First Solar South project is on resource-rich public land making it a very poor choice of site for a power plant project. The First Solar South power plant project including a photovoltaic solar plant and associated facilities would occupy 13,043 acres of federal land managed by the Bureau of Land Management (BLM). The project would be located on relatively undisturbed public lands that provide high quality habitat for the listed desert tortoise, and if approved would have significant direct, indirect and cumulative impacts on desert tortoises and their habitat, rare plants, ground water, and visual resources.
30-19	The DEIS must provide information on the water needs of this power plant both in the construction and operation phases, and should specify the source of these waters. The DEIS must fully analyze impacts to the already overstretched local and regional water reserves.
43-4	Moreover, water use should be addressed in the SEIS. The desert's scarce water resources should be managed wisely. The effects of groundwater pumping on local water sources, such as springs and residential wells, should be assessed in the SEIS.

Comment ID	Comment
50-2	<p>Other parts of the requested ROW would impinge upon sites identified by CCDOA as necessary for stormwater and flood control purposes to serve the SNSA.</p> <p>Subsequent to the publication of the underlying FEIS, CCDOA finalized its planning studies regarding additional sites that will be necessary to ensure adequate stormwater and flood control protection of the SNSA.<sup>5</sup> In September 2009, CCDOA applied to BLM for a ROW permit for the lands necessary for implementation of the SNSA flood control plan. (See serial no. NVN-087969, attached as Exhibit A). That application is still pending, and use of the sites for flood control purposes will be evaluated in the EIS for the SNSA.</p>
50-5	<p>The 13,043-acre ROW requested for the First Solar South Project encompasses a considerable amount of the land previously identified as part of the Overlay District for the SNSA: namely, all or parts of the T.26S, R.59E Sections 14, 27, and 34; and T.27S, R.59E, Sections 9 and 10. In addition, the proposed ROW would also encompass the two entire sections of land required by CCDOA for flood control for the SNSA, and addressed in CCDOA's 2009 ROW application to BLM (T.26S, R.59E, Sections 23 and 26). See Map at Exhibit C. This raises two significant issues for consideration in the SEIS.</p> <p>First, we remind BLM of its express commitment to not authorize land uses that would preclude the siting of the SNSA stormwater facilities.<sup>7</sup> CCDOA is currently planning to use all or parts of T.26S, R.59E Sections 14, 23, 26, 27, and 34 for flood control purposes needed to support the construction and operation of the airport. Therefore, in the SEIS for First Solar South, BLM must examine the degree to which granting the full 13,043-acre ROW would interfere with the proposed SNSA and its ancillary facilities, and deny any part of First Solar's application that is incompatible with the uses proposed in the SNSA EIS.</p> <p>In the underlying FEIS, BLM adequately addressed the issue of FAA regulations at 14 CFR Part 77, which require that any party proposing to construct a structure taller than 200 feet or within 20,000 feet of a proposed airport must provide notice to the FAA through FAA Form 7460 and receive a Determination from the FAA regarding whether the proposed structure or structures are hazards to air navigation. CCDOA recommends that the SEIS incorporate a similar discussion of these critical regulatory obligations and include a mitigation measure such as MM HAZ-6.</p>
50-6	<p>It is critical to understand the degree to which the following aspects of the First Solar South Project would affect both amount and rate of stormwater flows to the SNSA Site:</p> <ul style="list-style-type: none"> <li>• Increased impervious surface (because of paved access road, new buildings, and new parking lot);</li> <li>• Altered rate of flow due to cumulative effect of the solar panels from both projects (Silver State North and South) and First Solar's stormwater infrastructure (e.g., berms, debris basins, and level spreader detention basins);</li> <li>• Altered rate of sediment flow due to impacts to up gradient vegetation; and</li> <li>• Potential increased amount of flow (if the project applicant proposes to truck in substantial quantities of water per year).</li> </ul> <p>For that reason, CCDOA recommends that the SEIS examine the direct effects to existing drainage patterns and the cumulative effects to drainage, taking into account the SNSA drainage plans. CCDOA has already provided a detailed planning report for the proposed SNSA stormwater facilities to the BLM Las Vegas Field Office for use in the SNSA EIS. CCDOA stands ready to provide additional copies of this report or any additional information that may assist the BLM or project applicant.</p>
50-7	<p>Due to the proximity of the First Solar South Project to a proposed commercial service airport, any drainage or stormwater detention system constructed in conjunction with the Project should be consistent with FAA's guidance for avoiding wildlife attractants near airports. As part of its commitment to ensure compatible land uses near the SNSA (see Section 1, above), BLM has an obligation to ensure the Project complies with FAA guidelines. Therefore, the SEIS should also include a mitigation measure to prevent wildlife attractants near the planned airport. Per FAA's guidance, planning should address design requirements for any flood control drainage or water detention systems and also address plans to avoid trash and debris that may attract wildlife.</p>

55-6 Water Supply and Water Quality

PV electrical generation facilities generally need much less water than solar thermal plants. Nonetheless, the SDEIS should estimate the quantity of water the project will require and describe the source of this water and potential effects on other water users and natural resources in the project's area of influence. The SDEIS should clearly depict reasonably foreseeable direct, indirect, and cumulative impacts to this resource. If groundwater is to be used, the potentially affected groundwater basin should be identified and any potential for subsidence and impacts to springs or other open water bodies and biologic resources should be analyzed. The SDEIS should include:

- A discussion of the amount of water needed for the proposed PV electrical generation facility and where this water will be obtained, including the reliability of the water source.
- A discussion of the availability of groundwater within the basin and annual recharge rates. A description of the water rights permitting process and the status of water rights within that basin including an analysis of whether water rights have been over-allocated.
- A discussion of cumulative impacts to groundwater supply within the hydrographic basin, including impacts from other large-scale solar installations that have also been proposed.
- An analysis of different types of technology that can be used to minimize or recycle water.
- A discussion of whether it would be feasible to use other sources of water, including potable water, irrigation canal water, wastewater or deep-aquifer water.
- An analysis of the potential for alternatives to cause adverse aquatic impacts such as impacts to water quality and aquatic habitats.

The SDEIS should address the potential effects of project discharges, if any, on surface water quality. Specific discharges should be identified and potential effects of discharges on designated beneficial uses of affected waters should be analyzed.

The EPA strongly encourages the BLM to include in the SDEIS a description of all water conservation measures that will be implemented to reduce water demands. Project designs should maximize conservation measures such as appropriate use or recycled water for landscaping and industry, xeric landscaping and water conservation education.

#### Clean Water Act Section 404

The project applicant should coordinate with the D.S. Army Corps of Engineers to determine if the proposed project requires a Section 404 permit under the Clean Water Act. Section 404 regulates the discharge of dredged or fill material into waters of the United States (WOUS), including wetlands and other special aquatic sites. The SDEIS should describe all WOUS that could be affected by the project alternatives, include maps that clearly identify all waters within the project area. A jurisdictional delineation will confirm the presence or absence of WOUS in the project area and help determine impact avoidance or if state and federal permits would be required for activities that affect WODS. If a Section 404 permit is required, the EPA will review the project for compliance with Section 404(b)(1) Guidelines to ensure any permitted discharge into WODS must be the least environmentally damaging practicable alternative available to achieve the project purpose. If needed, the SDEIS should include an evaluation of the project alternatives within this context in order to demonstrate the project's compliance with the 404(b)(1) Guidelines. Aligning NEPA and CW A Section 404 requirements will streamline the permitting process if a permit is required.

#### Recommendations:

The SDEIS should include a jurisdictional delineation for all WODS, including ephemeral drainages, in accordance with the 1987 Corps of Engineers Wetlands Delineation Manual and the December 2006 Arid West Region/nrerim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region.

The SDEIS should quantify the geographic extent of WOUS that could be affected by the Project alternatives, and include maps that clearly identify all WODS within the Project area. The discussion should include acreages and channel lengths, habitat types, values, and functions of these WOUS.

55-6

The SDEIS should include a robust discussion of all avoidance and mitigation measures proposed for the Project and include an outline of the requirements of a compensatory mitigation plan.

Drainages, Ephemeral Washes, and Floodplains

The SDEIS should describe the original (natural) drainage patterns in the project locale, as well as the drainage patterns of the area during project operations, and identify whether any components of the proposed project are within a 50 or 100 year floodplain. The SDEIS should consider the upstream and downstream reach of waters and their importance in this landscape. Natural washes perform a diversity of hydrologic, biochemical, and geochemical functions that directly affect the integrity and functional condition of higher-order waters downstream. Healthy ephemeral waters with characteristic plant communities control rates of sediment deposition and dissipate the energy associated with flood flows. Ephemeral washes also provide habitat for breeding, shelter, foraging and movement of wildlife. Many plant populations are dependent on these aquatic ecosystems and adapted to their unique conditions.

Resources in the desert are particularly vulnerable to utility-scale solar energy development. These resources are being cumulatively impacted by the numerous large-scale solar development projects being proposed in the desert. The potential damage that could result from disturbance of such washes includes alterations to the hydrological functions that natural channels provide in arid ecosystems, including adequate capacity for flood control, energy dissipation and sediment movement, as well as impacts to valuable habitat for desert species. For these reasons, the EPA recommends that a "desert or ephemeral wash avoidance" alternative be created, which would be consistent with the goals and objectives of NEPA to promote efforts which will prevent or eliminate damage to the environment and biosphere (42 USC § 4321) and to attain the widest range of beneficial uses of the environment without degradation (42 USC § 4331).

Recommendations:

The EPA recommends that the SDEIS characterize the functions of any aquatic features that could be affected by the Proposed Project, including those determined not to constitute WOUS, and describe how the proponent will avoid, minimize, and mitigate such impacts.

The EPA recommends the development of a "desert or ephemeral wash avoidance" alternative for full evaluation in the SDEIS.

To avoid and minimize direct and indirect impacts to desert washes (such as erosion, migration of channels and local scour), the EPA recommends:

- A void placement of support structures in washes;
- Utilize existing natural drainage channels on site and more natural features, such as earthen berms or channels, rather than concrete-lined channels;
- Commit to the use of natural washes, in their present location and natural form and including adequate natural buffers, for flood control to the maximum extent practicable;
- Minimize the number of road crossings over washes and designing necessary crossings to provide adequate flow-through during storm events; and
- A void complete clearing and grading of the site by evaluating the mounting of PV panels at sufficient height above ground to maintain natural vegetation and reduce impacts to drainages.

Discuss the availability of sufficient compensation lands within the project's watershed to replace desert wash functions lost on the project site.

Construction in Areas of High Flood Risk

Some portions of the Project, particularly the Phase I section that was already approved, are located in areas of very high flood risk, which raises environmental as well as engineering and financial sustainability concerns due to increased erosion, migration of channels, local scour, and potential destabilization and damage to valuable facilities and equipment. The Silver State FEIS states that flood zones in the Proposed Project area are primarily low to none, although areas of moderate, high, and very high are present. We note, however, that most of the Phase I project area is located in the very high flood hazard class, and that significant portions of the Phase II project area are also located in the high and very high hazard class. This information suggests that the northern portion of the site, as least as proposed previously, may



Comment ID	Comment
55-6	<p data-bbox="207 105 556 138">be unstable during flood events.</p> <p data-bbox="207 170 1963 267"> <b>Recommendation:</b>            The EPA remains concerned about the proposed siting of the Silver State project in high flood hazard areas. We recommend that these areas be avoided whenever possible.         </p>
56-3	<p data-bbox="207 300 2026 397">           I am also concerned about how sheet flooding of the proposed site will be dealt with, especially as regards the impacts on the bajada downstream from the project site. In order to maintain the health and character of the vegetation downslope from the project there is a need for sheet flooding to occur across the site rather than to channel flood waters into a few major washes.         </p> <p data-bbox="207 430 2026 511">           The proponents have stated that they will partially grade and/or disc and then compact the site. How will this affect flood flows? Also, how will the proponent deal with the vegetation that will grow along the drip line of the solar panels. The concentration of rainfall along the panel driplines will have the effect of significantly increasing the natural rainfall in a small area along the dripline and there may be quite significant plant growth in wet years.         </p>

Comment ID	Comment
29-3	<p>The projected water demand when the system is in operation is 15 acre-feet per year. The ROW application does not indicate the projected water demand during construction. It is requested that Silver State Solar, LLC include in the Plan of Development, or provide to Primadonna Corporation, information on the source water during construction, if it will be via groundwater. The information that is requested includes quantity of water for the entire construction period, annual maximum extraction, and wellhead location. A detailed groundwater effects evaluation is requested from Silver State Solar, LLC on groundwater extraction and water quality during the construction period, including the effect on Primm's existing permitted water rights and associated wells.</p> <p>Primm has concerns that stormwater drainage patterns from the proposed project will be altered to negatively affect Primm property. It is requested that Silver State Solar, LLC complete flood control evaluations to demonstrate that no negative affect shall result from the proposed project .</p>
30-13	<p>Desert washes, drainage systems, and washlets are very important habitats for plants and animals in arid lands. Water concentrates in such places, creating greater cover and diversity of shrubs, bunch grasses, and annual grasses and forbs. The topography is often more varied, as are soil types and rock types and sizes, creating diverse sites for burrows, caves, and other shelters. The resulting “habitats” tend to attract more birds, mammals, reptiles, and invertebrates. For example, desert tortoises spend disproportionately more time in washes than they do on “flat” areas.<sup>4</sup> The wash habitat impacted by each alternative should be evaluated and appropriate mitigations made for stream bed alterations.</p>

Comment ID	Comment
15-6	So I think that's a very big concern, as well as you can have large connectivity with bighorn sheep. I know they come down and there are several rare plants.
30-8	<p>The DEIS should include and analysis of all direct, indirect and cumulative impacts to bighorn sheep is species including loss of foraging habitat, and impacts to linkage habitat and loss of connectivity. Bighorn have been observed adjacent to the project site. At a minimum, the BLM should require that the developer acquires compensation habitat to offset the loss of foraging habitat.</p> <p>There are a number of sensitive bird species known to present on or near proposed project the site including Golden Eagle (<i>Aquila chrysaetos</i>), Loggerhead Shrike (<i>Lanius ludovicianus</i>), Western Burrowing Owl (<i>Athene cunicularia hypugaea</i>), Le Conte's Thrasher (<i>Toxostoma lecontei</i>), Crissal Thrasher (<i>Toxostoma crissale</i>), Vaux's Swift (<i>Chaetura vauxi</i>), and Brewer's Sparrow (<i>Spizella breweri</i>). There are many other bird species found in the area that are known or expected to use the site. Clark Mountain is an identified "Important Bird Area" that supports populations of many rare birds including a breeding population of the declining Mexican Whip-poor-will. Birds move between the Clark Mountains and other areas to the east across the north Ivanpah Valley where the project is located.</p> <p>In their study of the Solar One project, McCrary et al., found that the most frequent form of avian mortality was collision with structures (McCrary et al., 1986). As McCrary et al point out; birds are especially prone to collisions with reflective surfaces, and in their study collisions accounted for 75% of the bird deaths. McCray et al found that at least 22 different bird species suffered collision fatalities with mirrors on the Solar One project. The proposed First Solar South project will establish a field of thousands of PV panels with highly reflective surfaces. Although there is little published data on risk of bird collision with PV panels the risk is probably similar to that posed by many other man-made features when placed in habitat. While many of the birds that use the project site are active during the day, some forage at night. However, even strictly diurnal species will take to flight at night if they disturbed. Thus the risk of risk of bird collision with the PV panels is round-the-clock.</p> <p>The DEIS should include a full and frank analysis of risks to birds including to golden eagles and determine the collision risks. It should characterize bird flight patterns, and should quantify anticipated avian deaths.</p>
30-18	The proposed project site is close to the South McCullough WSA. Because the project may affect the local water table, may affect wildlife movements, may result in the displacement of ORV users onto WSA lands, and may result in light pollution the project may still impair the wilderness character of the WSA. These direct and indirect impacts to wilderness character need to be analyzed.
42-5	What about the coyotes, lizards, birds and other animals that will be killed or displaced?
44-3	Aside from Desert Tortoise, Golden Eagle, and Desert Bighorn Sheep, other species at risk remain unidentified.
50-7	Due to the proximity of the First Solar South Project to a proposed commercial service airport, any drainage or stonnwater detention system constructed in conjunction with the Project should be consistent with FAA's guidance for avoiding wildlife attractants near airports. As part of its commitment to ensure compatible land uses near the SNSA (see Section 1, above), BLM has an obligation to ensure the Project complies with FAA guidelines. Therefore, the SEIS should also include a mitigation measure to prevent wildlife attractants near the planned airport. Per FAA's guidance, planning should address design requirements for any flood controVdrainage or water detention systems and also address plans to avoid trash and debris that may attract wildlife.
52-2	As we transition toward a clean energy future, it is imperative for our future and the future of our wild places and wildlife that we strike a balance between addressing the near term impacts of largescale solar energy development with the long-term impacts of climate change on our biological diversity, fish and wildlife habitat and natural landscapes. To ensure that the proper balance is achieved, we need smart planning for renewable power that avoids and minimizes adverse impacts on wildlife and wild lands.

Comment ID	Comment
52-7	<p>Unfortunately, the proposed project is located in high quality habitat that is occupied by the threatened Desert tortoise and other sensitive species of plants and animals<sup>1</sup> and, as such, appears to be inappropriately sited. The proposed Project and alternatives would not only destroy habitat but will also significantly increase fragmentation and contribute to the loss of habitat connectivity for the Desert tortoise and other species.</p> <p>As mentioned above, we have urged BLM to undertake an ecological analysis of the Ivanpah Valley as a whole before moving forward with the permitting process for individual project proposals. Only by taking a landscape level look at these issues first, without the arbitrarily placed ROW applications as a starting point, can the BLM accurately assess the viability of the population and the areas that are most important to preserve. BLM must ensure that any additional renewable energy projects within occupied desert tortoise habitat in this area, or that increase fragmentation in the valley, will not jeopardize the tortoise population or its future viability in this area.</p> <p>BLM is legally required under Section 7(a)(1) of the Endangered Species Act to use its authority to further the conservation (recovery) of threatened and endangered species, which it must carry out here because the Desert tortoise has been listed as a threatened species since 1990. We expect BLM to establish policies that will conserve Desert tortoises and their habitat in the Ivanpah Valley and to ensure that they remain interconnected with populations occurring in the Eastern Mojave and Northeastern Mojave Recovery Units.</p> <p>We strongly urge BLM to adopt these conservation recommendations and consider other significantly different alternatives or deny the proposed project in order to ensure that it will not prevent BLM from carrying out its legal obligation to conserve the Desert tortoise within the Eastern Mojave and Northeastern Mojave Recovery Units.</p>
53-2	<p>(Big Horn Sheep) Baseline data needs to be collected Pre-construction on migration routes, lambing impacts, herd relocation.</p> <p>(Birds [raptors &amp; song birds] and bats) Baseline data needs to be collected Pre-construction on the existing populations including species, numbers, flight patterns, nesting and foraging.</p> <p>(Reptiles and small mammals) Baseline data needs to be collected Pre-construction on the existing populations including species, numbers, movement, living or foraging.</p> <p>(Insects and Arachnids) Baseline data needs to be collected Pre-construction on the existing populations including species, numbers, movement, living or foraging.</p>

55-7

The SDEIS should identify all petitioned and listed threatened and endangered species and critical habitat that might occur within the project area. The document should identify and quantify which species or critical habitat might be directly, indirectly, or cumulatively affected by each alternative and mitigate impacts to these species. Emphasis should be placed on the protection and recovery of species due to their status or potential status under the federal or state Endangered Species Act. For this project, EPA is particularly concerned regarding potential impacts to desert tortoise and Death Valley ephedra..

Recommendations:

The EPA recommends that the BLM consult with the U.S. Fish and Wildlife Service and prepare a Biological Opinion under Section 7 of the ESA for all threatened or endangered species present, including the desert tortoise. The SDEIS should provide a recent status update of these actions.

The BLM should coordinate across field offices, and with the USFWS as well as state wildlife agencies, to ensure that current and consistent surveying, monitoring, and reporting protocols are applied in protection and mitigation efforts.

Analysis of impacts and mitigation on covered species, such as the desert tortoise, should include:

- Baseline conditions of habitats and populations of the covered species.
- A clear description of how avoidance, mitigation and conservation measures will protect and encourage the recovery of the covered species and their habitats in the project area.
- Consistent monitoring, reporting and adaptive management efforts to ensure species and habitat conservation effectiveness.
- Implementing post-translocation monitoring and adaptive management strategies will be crucial in evaluating the impacts to species and the success rate of the experimental translocation program.

If the applicant is to acquire compensation lands, the location(s) and management plans for these lands should be discussed in the SDEIS. In light of the numerous projects proposed in the Ivanpah Valley, available land to adequately compensate for environmental impacts to sensitive resources may serve as a limiting factor for development.

Recommendations:

Incorporate into the SDEIS information on the compensatory mitigation proposals (including quantification of acreages, estimates of species protected, costs to acquire compensatory lands, etc ... ) for unavoidable impacts to biological resources, such as desert tortoise.

Identify compensatory mitigation lands or quantify, in the SDEIS, available lands for compensatory habitat mitigation for this project, as well as reasonably foreseeable projects in the Ivanpah Valley area. Specify provisions that will ensure habitat selected for compensatory mitigation will be protected in perpetuity.

Incorporate, into the SDEIS, mitigation, monitoring, and reporting measures that result from consultation with the USFWS and that incorporate lessons learned from other solar projects and recently released guidance to avoid and minimize adverse effects to sensitive biological resources.

Discuss mitigation ratios for tortoise habitat and how these relate to the mitigation ratios recommended by other agencies, as well as how they relate to mitigation ratios used for other renewable energy projects in California and Nevada.

The SDEIS should describe the potential for habitat fragmentation and obstructions for wildlife movement from the construction of this project and other utility scale renewable energy projects in the Ivanpah Valley area.

Discuss the need for monitoring, mitigation, and if applicable, translocation management plans for the sensitive biological resources approved by the BLM and the biological resource management agencies. This would include, but is not limited to, an Avian Protection Plan, a Raven Monitoring, Management and Control Plan,

Comment ID	Comment
55-7	<p data-bbox="207 110 2043 168">Burrowing Owl Mitigation, Desert Tortoise RelocationfTranslocation Plan, Desert Tortoise Compensatory Mitigation Plan, and Special - Status Plant Impact Avoidance and Mitigation Plan.</p> <p data-bbox="207 207 2043 298">The EPA is also concerned about the potential impact of construction, installation, and maintenance activities (deep trenching, grading, filling, and fencing) on habitat. The SDEIS should describe the extent of these activities and the associated impacts on habitat and threatened and endangered species. We encourage habitat conservation alternatives that avoid and protect high value habitat and create or preserve linkages between habitat areas to better conserve the covered species.</p> <p data-bbox="207 337 2043 396">Recommendations: The SDEIS should describe the extent of potential impacts from construction, installation, and maintenance activities.</p> <p data-bbox="207 435 2043 493">The SDEIS should indicate the location of important wildlife habitat areas. The SDEIS should describe what measures will be taken to protect important wildlife habitat areas and to preserve linkages between them.</p> <p data-bbox="207 532 2043 612">The SDEIS should provide detailed information on any proposed fencing design and placement, and its potential effects on drainage systems on the project site. Fencing proposed for this project should meet appropriate hydrologic, wildlife protection and movement, and security perfOlmance standards. Those standards should be described in the SDEIS.</p>

Comment ID	Comment
1-3	I would highly recommend that first solar look to the Apex valley or in the Eldordo (sic) valley .
4-2	I urge you to reconsider the placement of this project. The sun shines pretty much everywhere so why can't it go somewhere else? Again I ask you to please reconsider!
6-3	I would highly recommend taking a look into to the Apex valley or Eldordo (sic) valleys.
7-2	What would be wrong with putting them anywhere else that would still work with your need and our needs that you guys are trying to do and also leave room for the race cars to have a place to race in Primm so we can keep that town up and running seeing that we bring in a ton of revenue to primm every time a race is held and it sells out all three casino rooms plus the money we pay for food drinks and game play.
8-3	While I can certainly see the need for more power generation, I absolutely do not see the need to displace an entire industry of manufacturers, race promoters, hobbyist and the like, when there are a great deal of other locations to build said facility.
9-2	Nevada has plenty of Sunshine and areas for solar plants but we can only have competitive OHV events on existing race courses and losing the primm track would be devastating to our sport and the economics of the off road and ohv suppliers, vendors, promoters etc.
9-3	I would highly recommend that first solar look to the Apex valley or in the Eldordo (sic) valley.
10-2	This solar plant would be better suited in apex valley or on the west side of I-15 .
13-5	These facilities should be put in California where the power is going to be used such as the Baker or Barstow area in California where there is no off-road or public activity and the expanse of the areas are far greater than the area you are proposing and still next to your power grid.



Comment ID	Comment
15-3	<p>We actually have a coalition with another group called Solar Done Right, which is a group of different people like engineers, environmentalists, whatnot that would like to produce the alternative of putting energy like this in a more disturbed environment.</p> <p>What we'd like you to consider are different alternatives here. One thing I'd like to get into, we've been told by BLM that there are mandates and executive orders from the Interior Department -- I've read them -- that say you have to place so much renewable energy on so many acres of public land, so many megawatts in certain acres, and that's clearly within. But what's vague in that language, it doesn't say the Silver State Project cannot be --BLM cannot consider alternatives on that.</p> <p>What I'm getting at, in items of private land alternative and distributed generation alternatives are out of the question. But there's a conflict in that language in the National Environmental Policy Act that does say that alternatives outside of the jurisdiction with the lead agency will be considered.</p> <p>And that's still in there. So we think that that's an opportunity missed. You've got probably about maybe 300 or so construction jobs that would be made by the project here, but when you think about it, when you get full-time jobs, you're going to have about 15 or so.</p> <p>What if we look into an alternative of a feeder ring in the city of Las Vegas that has a lot of bare rooftops and photovoltaic panels as part of the desert that they're built on.</p> <p>I mean, wouldn't that sustain a lot more jobs for a lot longer time? These are things to think about.</p> <p>I'd also like to say that the Environmental Protection Agency is identified about, just in California alone, 350,000 acres of ground fill contaminated by all the brown field that will be fine for a large-scale project.</p> <p>There are a lot of things to do. We'd like you to consider ACEC nomination alternative that we're going to submit and have probably quite a few groups that we know sign on to, probably at the end of October. And it's actually an alternative that doesn't include the approval of the Stateline and Silver State Project. It actually asks that we form the entire ACEC. We have that linked on our website, Basin and Rainforest. I'd like people to look at it.</p>
24-3	<p>So from my side I question you why didn't you move south towards into the California side? That area between desert, which is on the railroad tracks, and Primm can't be used for anything. That side of that mountain can't be used for anything. It's the perfect place to go.</p> <p>think I asked a question and I don't think I heard the answer. How come you don't move the project south towards the desert?</p> <p>Casey again here, sir. That was my point earlier. The checkered part that you have, if you moved to there, you'd have no impact on off-road racing. We can't race there. There's no corridor through there. There's the Lucy Grays and the Calvada Wash area that we use is running --you've already got a little corridor through there, but if you move your project down to where the checkers are at, that's what I was saying before, you're moving towards the town of Nipton and you're still in Nevada, you wouldn't affect us at all if you did that.</p> <p>I'm sorry, Daryl just pointed it out, we're just looking at it there, if you moved to there, we have no problem with it. We can't race there anyway.</p>
30-2	<p>This location was proposed for inclusion within a desert tortoise conservation area in the United States Fish and Wildlife Service's original 1994 Desert Tortoise (Mojave Population) Recovery Plan underlining the ecological importance and environmental sensitivity of the project site. Because of the sensitivity of this site, the BLM must make a good faith effort to consider alternative sites for this proposed power plant.</p>

Comment ID	Comment
30-5	<p>The NEPA implementing regulations specify that NEPA documents must analyze a full range of alternatives including “reasonable alternatives not within the jurisdiction of the lead agency” (40 C.F.R. § 1502.14). Based on the information and analysis presented in the sections on the Affected Environment (40 C.F.R. § 502.15) and the Environmental Consequences (40 C.F.R. § 1502.16), the NEPA document should present the environmental impacts of the proposed action and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public</p> <p>In order to comply with the spirit and letter of NEPA, the EIS must consider alternatives that meet the project goals and not simply propose “straw man” alternatives that can then be dismissed from further consideration. We suggest that the agencies consider the following reasonable alternatives in addition to any proposed action:</p> <p>(1) Las Vegas RMP Plan Amendment Alternatives</p> <p>(a) No Development Alternative. This would amend the Las Vegas RMP to make the entire 13,043 acre project area unavailable for energy development.</p> <p>(b) Desert Tortoise Conservation Alternative. This would amend the Las Vegas RMP to comply with conservation recommendations made by the USFWS in its Biological Opinion<sup>1</sup> for the ISEGS project to make the entire 13,043 acres unavailable for energy development and would designate the area as an ACEC or addition to the existing DWMA to conserve desert tortoises and preserve essential connectivity within the Ivanpah Valley.</p> <p>(2) ROW Issuance Alternatives</p> <p>(a) No Action Alternative as is required by NEPA.</p> <p>(b) Public lands that are not desert tortoise habitat.</p> <p>(c) A private lands alternative under which the project is built on private lands only.</p> <p>(d) A green energy alternative that would use distributed energy such as “roof top” solar and other technologies to avoid the need for construction of a power plant.</p> <p>Full analysis of these alternatives will help clarify the need for the proposed project, provide a baseline for identifying and fully minimizing resource conflicts, facilitate compliance with the BLM’s FLPMA requirement to prevent the unnecessary and undue degradation of public lands and its resources, and will help provide a clear basis for making an informed decision.</p>
31-2	There is so much more land in Nevada that can be used for this project. Please consider the negative outcome of using this land.
33-1	Im writing you this email in regards to the proposed solar project at state line. There has to be somewhere better to plan this project.
36-2	We need solar power, I agree, but we can do it on the other side of the road so it doesn’t stop our desert racing there. There is plenty of room, we would just like to be included in the decision making.
38-2	I oppose any and all closing of BLM lands for Solar projects as there are many better choices for location of these solar farms.
42-2	I feel the Bureau of Land Management should be looking for alternatives in brown fields near urban developments and should be advocating photovoltaic systems on roof tops over the destruction of so much biological diversity on such large tracts of land.
43-5	Finally, this project will require the destruction of thousands of acres of intact public lands, which are owned by the American people. Few organisms will survive on the footprint of this power plant. I believe that it is unacceptable to sacrifice ecologically intact public lands while there are thousands of acres of disturbed lands, such as former agricultural lands and contaminated sites identified by the EPA, in Nevada. The Draft EIS should seriously consider a private land alternative like the current Beacon Solar Energy project in California, as well as a large-scale rooftop photovoltaic project, such as Southern California Edison's projects in the Inland Empire of southern California. This type of project could be repeated many times over in Nevada, with minimal impacts to wild lands and wildlife. And the Beacon Solar Energy and SCE projects prove that this type of project is viable.

51-3

The Council feels strongly that the SEIS for the Silver State South project should include an alternative specifically designed to conserve wild desert tortoise populations in the Ivanpah Valley. This alternative should be designated the “preferred alternative.” The conservation alternative should (1) preclude siting Silver State South on any of the 13,043 acres of public lands managed by the BLM that are targeted by First Solar (Silver State Solar, LLC) in its right-of-way application. The conservation alternative should (2) preclude any further development of BLM lands in the Ivanpah Valley by setting aside all those remaining public lands for conservation (with the possible exception of Ivanpah Dry Lake). Similar to this, the Council (2011) proposed that a conservation alternative be incorporated and designed as the “preferred alternative” in the environmental impact statement on First Solar’s right-of-way application for the Stateline project.

The conservation alternative should be the “preferred alternative” as it would give appropriate weight to the Federal mandate to conserve and recover the Federally-threatened desert tortoise by protecting a significant subpopulation of tortoises. The conservation alternative should be the “preferred alternative” as it would protect the expanse of quality public lands managed by the BLM in the Ivanpah Valley as unfragmented habitat.

Since the 1990 listing of the desert tortoise by the Federal government, “desert tortoise habitat has continued to be lost or degraded..., keeping tortoise populations in an insecure state...” (USFWS 2011b, p. 34). In the Ivanpah Valley, there is an opportunity to reverse rather than accelerate the deterioration, fragmentation, and loss of habitat. The conservation alternative would shield (a) lands not designated as critical habitat in 1980 and 1994 but subsequently found to support significant tortoise populations; (b) lands adjacent to critical habitat and for which development would have severe adverse impacts; and (c) lands that serve to connect critical habitat or parts of critical habitat and, in this case, the Mojave National Preserve. Protecting habitat is even more important today as the recent splitting of *Gopherus agassizii* and description of a new species of desert tortoise (*G. morafkai*) reduces the distribution of *G. agassizii* to about 30 percent of its former range (Murphy, et al. 2011).

USFWS recognized the importance of limiting development in the Ivanpah Valley to protect habitat with its Section 7(a)(1) Endangered Species Act recommendations to the BLM on ISEGS. In its initial biological opinion (2010), USFWS urged that BLM amend the California Desert Conservation Area Plan to prohibit any further large-scale, energy facilities within the area bounded by Interstate 15, the California-Nevada stateline, and the Clark Mountains, an area that includes the proposed Stateline project. USFWS advised BLM that “the potential exists that this portion of the Ivanpah Valley may be disturbed and fragmented to the extent that desert tortoises and other wildlife populations may be severely compromised” (2010, p. 63). In its revised biological opinion on ISEGS (2011a, pp. 92-93), USFWS recommended that BLM amend its land use plans “to prohibit large-scale development within all remaining portions of the Ivanpah Valley to reduce fragmentation within the critical linkage between the Ivanpah Critical Habitat Unit and the Eldorado Critical Habitat Unit.”

Given the information in the preceding paragraph, the Council feels that it is imperative that the SEIS fully analyze the BLM’s intent (or failure) to implement these USFWS recommendations. Either the BLM has new information that disproves USFWS’ contention, in which case new data in the SEIS should be presented and analyzed that the loss of an additional 4,000 acres will not seriously fragment critical habitats. Or, in the absence of supporting new data, the Council contends that the BLM is obligated to accept USFWS’ recommendation and reject the proposal to allow construction of this 4,000-acre project. In the absence of new data presented in the SEIS showing that fragmentation would not be significant and deleterious to regional of tortoise populations, the Council feels that BLM must reject this proposed project.

These USFWS recommendations represent a conservation vision that merits recognition and implementation by BLM. If the BLM does not reject this proposed project, the Council believes that USFWS must acknowledge its statements about prohibiting additional large-scale development in Ivanpah Valley, and in so doing, issue a jeopardy biological opinion on Silver State South, a project that will introduce more adverse impacts to this sensitive, important area.

Comment ID	Comment
52-3	<p>These projects should be placed in the least harmful locations near existing transmission lines and on already disturbed lands.</p> <p>As we and our colleagues at sister organizations have repeatedly stated, the best way to develop renewable resources is through comprehensive, pro-active planning by federal, state and local governments to identify the most appropriate areas for such development -- i.e., development zones -- and to guide development to those zones. See, e.g., letter dated June 29, 2009 to Interior Secretary Salazar and California's Governor Schwarzenegger and signed by 11 organizations, including our own, which is included as an attachment to this letter.</p>
52-5	<p>That said, renewable development is not appropriate everywhere on the public lands and must be balanced against the equally urgent need to protect unique and sensitive resources, such as the threatened Desert tortoise and its habitat. There are many opportunities for development of renewable energy generation and transmission in the West and Southwest, including lands in Nevada, Arizona and California where solar energy resources are abundant, and we believe that the opportunities are sufficient to provide for solar energy development in an environmentally and economically sound manner.</p>
52-11	<p>Alternatives are extremely important considering that public land-based renewable energy projects, individually and cumulatively, have resulted in the allocation of tens of thousands of acres of ecologically intact public lands to single-use, utility scale energy projects in just the past year.</p> <p>The range of alternatives must be carefully and methodically developed as a means to primarily avoid, and secondarily to minimize, adverse impacts to natural and cultural resources on our public lands, and especially because of statutory management requirements contained in the Federal Land Policy and Management Act, the Endangered Species Act (Section 7(a)(1), and BLM's policy for management of Special Status Species (Manual 6840). Alternatives to the proposed project, including alternative locations and reduced project sizes, need to be fully considered and analyzed. Alternative locations considered and analyzed should include those comprising lands, both public and private, that have little or no long-term ecological and conservation value. We strongly urge the BLM and the project applicant to thoroughly search for such lands and include them in the alternatives analysis. The justification in the FEIS for not analyzing other locations simply because the applicant has proposed projects elsewhere, including California, is clearly insufficient and contrary to the provisions of NEPA.</p>

Comment ID	Comment
55-5	<p>The National Environmental Policy Act requires evaluation of reasonable alternatives, including those that may not be within the jurisdiction of the lead agency (40 CFR Section 1502.14(c)). A robust range of alternatives will include options for avoiding significant environmental impacts. The SDEIS should provide a clear discussion of the reasons for the elimination of alternatives which are not evaluated in detail. A range of reasonable alternatives should include alternative sites and technologies; alternatives with reduced acreage, reduced MWs, or modified footprints; as well as alternatives that identify and avoid environmentally sensitive areas or areas with potential use conflicts. The alternatives analysis should describe the approach used to identify environmentally sensitive areas and describe the process that was used to designate them in terms of sensitivity (low, medium, and high).</p> <p>The environmental impacts of the proposal and alternatives should be presented in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public (40 CFR 1502.14). The potential environmental impacts of each alternative should be quantified to the greatest extent possible (e.g., acres of pristine desert impacted, tons per year of emissions produced).</p> <p>Recommendations:</p> <p>The SDEIS should describe how each alternative was developed, how it addresses each project objective, and how it will be implemented.</p> <p>The SDEIS should identify and analyze an environmentally preferred alternative. This alternative should consider options such as downsizing the proposed project within the project area and/or relocating sections/components of the project to other areas, including private land, to avoid or reduce environmental impacts.</p> <p>The alternatives analysis should include a discussion of reduced acreage, reduced MWs, and modified footprint alternatives, as well as alternative sites. The EPA recommends consideration of a "desert or ephemeral wash avoidance" alternative for full evaluation in the SDEIS. The SDEIS should clearly describe the rationale used to determine whether impacts of an alternative are significant or not. Thresholds of significance should be determined by considering the context and intensity of an action and its effects (40 CFR 1508.27).</p> <p>The EPA strongly encourages BLM and other interested parties to pursue the siting of renewable energy projects on disturbed, degraded, and contaminated sites, including fallow or abandoned agricultural lands before considering large tracts of undisturbed public lands.</p>

Comment ID	Comment
16-1	Hi, my name is Rob Mrowka, spelled M-r-o-w-k-a. And I have a question rather than a comment. I was going to ask Greg if he could expound a little bit about the need for an RMP amendment when the first phase wasn't found to need an amendment.
20-1	My question is why are you asking for 13,000 acres when this project is only 2900 acres?
17-4	Do you have an expected date for the draft Supplemental EIS to be available?
24-4	<p>The next question I have is the land that you want to acquire, it's public domain as we speak right now, it's BLM land, so are you buying this from the BLM? How do they get the land?</p> <p>So as we speak tonight, this project, this piece that I'm looking at there, has not been approved by the BLM?</p>
24-6	<p>Is this the first public meeting you've had on this? No, that's what I mean, it's the third meeting of Primm, Las Vegas? It seemed to me like I might be wrong but it seemed to me like this meeting should have been six or seven months ago when people -- I mean, somebody spent a lot of money out there already. It sounds to me like this project is moving straight forward as fast as it can.</p> <p>The other thing I want to make real clear tonight, I'm one person with my son here representing Trac-On, but if it needs letters, how long do I have for letters before, to submit letters?</p> <p>I'm not sure whether you said it or this lady said it earlier, but I thought I heard somebody say they're going to make an amendment to the resource management plan.</p> <p>Well, correct me if I'm wrong, maybe, Bob, you can answer this, but I understand the resource management plan amendment costs thousands of dollars, literally thousands of dollars?</p>
27-2	In addition to an analysis of the impacts of the subject project on Clark County mitigation areas, we would expect to see in the NEPA process the development of mitigation by this project for loss of the mitigation actions previously funded by Clark County for non-federal actions covered by our incidental take permit.
44-5	BLM land policy needs strong public review, as when these lands are lost or exploited, they are lost for generations or centuries, or until we cease to exploit lands on a large scale. Americans need wild public lands more than we need increased power generation. We must first apply significant conservation measures for electrical power, heating, air conditioning, before enlarging grid-power systems.
49-1	As you know, in September and October 2010, the BLM issued a Final EIS and Record of Decision (ROD), respectively, for a similarly proposed 400 MW project. However, the ROD and accompanying Right-of-Way lease/grant (Serial # N-85077) reflected a significantly reduced power generation facility of 50 MW onto which the facility was not to occupy more or less, 618 acres. You may also recall that comments facilitated by the Nevada State Clearinghouse (SAI# E2010-206) and provided to the BLM in spring 2010 regarding the Draft EIS, were not incorporated into the Final EIS of September 2010 because of an administrative error internal to BLM. Having participated in the previous project as a cooperating agency, NDOW met with the BLM on this matter in October 2010. NDOW was assured that comments to the 2010 Draft EIS would be carried forward if and when another ROW application was received and the NEPA process would begin anew. The current project proposed by Silver State Solar Power South, LLC would seem to be the next phase of effort and NDOW welcomes participation at minimum in BLM's NEPA process as a cooperating agency. Because the proposed project is now on a larger ROW footprint, we also look forward in supplementing previous inputs as opportunities arise and which are conducive to GIS-based analyses.

51-3	<p>The Council feels strongly that the SEIS for the Silver State South project should include an alternative specifically designed to conserve wild desert tortoise populations in the Ivanpah Valley. This alternative should be designated the “preferred alternative.” The conservation alternative should (1) preclude siting Silver State South on any of the 13,043 acres of public lands managed by the BLM that are targeted by First Solar (Silver State Solar, LLC) in its right-of-way application. The conservation alternative should (2) preclude any further development of BLM lands in the Ivanpah Valley by setting aside all those remaining public lands for conservation (with the possible exception of Ivanpah Dry Lake). Similar to this, the Council (2011) proposed that a conservation alternative be incorporated and designed as the “preferred alternative” in the environmental impact statement on First Solar’s right-of-way application for the Stateline project.</p> <p>The conservation alternative should be the “preferred alternative” as it would give appropriate weight to the Federal mandate to conserve and recover the Federally-threatened desert tortoise by protecting a significant subpopulation of tortoises. The conservation alternative should be the “preferred alternative” as it would protect the expanse of quality public lands managed by the BLM in the Ivanpah Valley as unfragmented habitat.</p> <p>Since the 1990 listing of the desert tortoise by the Federal government, “desert tortoise habitat has continued to be lost or degraded..., keeping tortoise populations in an insecure state...” (USFWS 2011b, p. 34). In the Ivanpah Valley, there is an opportunity to reverse rather than accelerate the deterioration, fragmentation, and loss of habitat. The conservation alternative would shield (a) lands not designated as critical habitat in 1980 and 1994 but subsequently found to support significant tortoise populations; (b) lands adjacent to critical habitat and for which development would have severe adverse impacts; and (c) lands that serve to connect critical habitat or parts of critical habitat and, in this case, the Mojave National Preserve. Protecting habitat is even more important today as the recent splitting of <i>Gopherus agassizii</i> and description of a new species of desert tortoise (<i>G. morafkai</i>) reduces the distribution of <i>G. agassizii</i> to about 30 percent of its former range (Murphy, et al. 2011).</p> <p>USFWS recognized the importance of limiting development in the Ivanpah Valley to protect habitat with its Section 7(a)(1) Endangered Species Act recommendations to the BLM on ISEGS. In its initial biological opinion (2010), USFWS urged that BLM amend the California Desert Conservation Area Plan to prohibit any further large-scale, energy facilities within the area bounded by Interstate 15, the California-Nevada stateline, and the Clark Mountains, an area that includes the proposed Stateline project. USFWS advised BLM that “the potential exists that this portion of the Ivanpah Valley may be disturbed and fragmented to the extent that desert tortoises and other wildlife populations may be severely compromised” (2010, p. 63). In its revised biological opinion on ISEGS (2011a, pp. 92-93), USFWS recommended that BLM amend its land use plans “to prohibit large-scale development within all remaining portions of the Ivanpah Valley to reduce fragmentation within the critical linkage between the Ivanpah Critical Habitat Unit and the Eldorado Critical Habitat Unit.”</p> <p>Given the information in the preceding paragraph, the Council feels that it is imperative that the SEIS fully analyze the BLM’s intent (or failure) to implement these USFWS recommendations. Either the BLM has new information that disproves USFWS’ contention, in which case new data in the SEIS should be presented and analyzed that the loss of an additional 4,000 acres will not seriously fragment critical habitats. Or, in the absence of supporting new data, the Council contends that the BLM is obligated to accept USFWS’ recommendation and reject the proposal to allow construction of this 4,000-acre project. In the absence of new data presented in the SEIS showing that fragmentation would not be significant and deleterious to regional of tortoise populations, the Council feels that BLM must reject this proposed project.</p> <p>These USFWS recommendations represent a conservation vision that merits recognition and implementation by BLM. If the BLM does not reject this proposed project, the Council believes that USFWS must acknowledge its statements about prohibiting additional large-scale development in Ivanpah Valley, and in so doing, issue a jeopardy biological opinion on Silver State South, a project that will introduce more adverse impacts to this sensitive, important area.</p>
52-6	<p>Despite our fundamental belief in the critical importance of agency-guided development of renewable energy, rather than developer-initiated development, we invested a great deal of time and effort into the “fast track” projects last year, and will engage on individual projects, such as this one, in 2011.</p>



Comment ID	Comment
52-9	Based on our recent experience in analyzing and commenting on many NEPA documents for fast-track renewable energy projects in the California Desert and Nevada, which were published by the BLM, we strongly recommend that BLM pay particular attention to developing accurate and factual sections of the NEPA document for the proposed project for 1) purpose and need, and 2) alternatives to the proposed action.
52-15	BLM in Nevada and California need to pursue a coordinated approach to address cumulative impacts of existing and planned developments, but, even more importantly, a sufficiently robust habitat conservation strategy for the entire Ivanpah Valley. Such a strategy should address recovery of the Desert tortoise through sustained habitat protection and necessary habitat enhancements, such as highway fencing, culverts or other devices to provide for movements of individuals, maintaining gene flow and elimination of unnecessary impediments to connectivity in both California and Nevada.

Comment ID	Comment
3-3	Please leave a corridor or stay on just one side of the railroad tracks so we can access BLM (Public) land.
12-1	Hillside development--preserving all hills 12% above.
15-2	And we're not necessarily against renewable energy, it's just the size and the location of a lot of these applications that are of great concern.
17-1	Can you just explain how this is different in terms of footprint from the previous project, Next Light project?
20-1	My question is why are you asking for 13,000 acres when this project is only 2900 acres?
22-1	<p>I have two questions. What's the duration of the permit that's allowed for this project? What about restoration of it (the site)?</p> <p>And you're also proposing that you're putting in a new power line that's going off of this solar plant next to the grid that's already existing; is that correct?</p> <p>And the power is going to where? California?</p> <p>Okay. And my final question is it seems to me that it would have been more productive all the way around for everybody involved if it would have been put in a less populated or used area, not populated but less used area such as in the California side of the state line there, of course not in the Mojave or the tortoise area but why wasn't it or was that considered?</p> <p>And my last question would be he mentioned before on the California/Nevada border there, is there some reason it didn't cross into the California border?</p>
23-1	<p>What will back this up? Where is the gas or the coal, whatever that will be generating at night? There's no storage facilities, is there, with this solar plant?</p> <p>Part two of that, you say approximately 350 megawatts. Is that based on a nameplate rating of 24 hour operations or for an average of say ten hours a day?</p>

Comment ID	Comment
24-5	<p>Well, judging and looking and looking at the markers that I've looked at out there, they've pretty well landlocked and taken away the Roach Lake portion for any kind of off-road racing over there. And I can tell you right now, people can tell me all day long, I don't have a problem, we'll find a corridor for you. Once again, when you take 200, 300 high horsepower cars and trucks and run them through there, you've got a problem. They're going to have a problem with it.</p> <p>If somebody wants to give us a letter that says for the next 20 years we won't say anything, no problem, but it won't happen. It isn't going to happen. Whoever runs the company is going to go, No way, we're not going to sign a letter like that. That will shut off racing in Southern Nevada as we know it right now if that project goes in.</p> <p>A couple of things. When Daryl is talking about your washing them, that's because wherever you got them already, there is no off-road racing of cars and trucks. Come out here, I invite you to come here December 2nd, watch the racing and you will go, oh, my God, there's no way we can have this.</p> <p>We went through this experience with the ones in Eldorado Valley and the same thing, I sat at the meeting and listened to the man say, No problem. Three or four months later, Sorry, your race can't come through anymore. Now we can't go into Eldorado Valley anymore because of the panels.</p> <p>Well, you know, once again, sir, I'm not trying to pick on you but in my background, my history, I've seen this happen a hundred times. We're going to work with you, we're going to work with you, we're going to work with you. You won't affect us. And then pretty quick, Hey, you guys can't be here anymore, we've got to stop this, and you just close down all the corridors right here.</p> <p>Once again I proposed routes for a March race right through your lines right there, and we get anywhere near you within a mile or two, you've got a problem. I guarantee you there will be a problem with the dust, just the dust, not to mention rocks, debris flying off the cars. Pit access. We have a proposed pit right there on the edge of Roach dry lake. You're talking 4, 500, maybe 700 vehicles going in and out of there across the public access at the end of the NDOT right-of-way across the railroad tracks there, the county right-of-way. There's a big impact.</p>
25-3	<p>The last question I have is if we look at the lower section of the blue, looks like we've got something checkered below that. What exactly is that?</p> <p>Okay. So that area has been studied right there where I'm seeing it appears to be like, you know, a checkerboard going down?</p> <p>Is that area going to be used or is that in question at this point?</p>
30-3	<p>The proposed Stateline PV project that would be located nearby just north of the Nevada/California border expects to generate 300 megawatts from a 2,000 acre plant. Based on those numbers, a 300 megawatt plant would require about 3,000 acres. In asking for 10,000 acres more than it needs the Silver State Solar, LLC, ROW application amounts to an extraordinary land grab that needs further explanation.</p>
50-2	<p>Other parts of the requested ROW would impinge upon sites identified by CCDOA as necessary for stormwater and flood control purposes to serve the SNSA.</p> <p>Subsequent to the publication of the underlying FEIS, CCDOA finalized its planning studies regarding additional sites that will be necessary to ensure adequate stormwater and flood control protection of the SNSA.5 In September 2009, CCDOA applied to BLM for a ROW permit for the lands necessary for implementation of the SNSA flood control plan. (See serial no. NVN-087969, attached as Exhibit A). That application is still pending, and use of the sites for flood control purposes will be evaluated in the EIS for the SNSA.</p>
50-4	<p>while CCDOA neither supports nor opposes the Project, the actual ROW application under consideration by BLM covers considerably more land than has been identified as necessary for the siting of the Project itself. This is a critical distinction because CCDOA has serious concerns about potentially conflicting uses within the broad ROW at issue in the SEIS. CCDOA is committed to ensuring that any new infrastructure in southern Nevada is compatible with the siting, construction, and operation of the SNSA. In light of that fact, CCDOA files these comments on the Proposed Project.</p>

Comment ID	Comment
50-5	<p>The 13,043-acre ROW requested for the First Solar South Project encompasses a considerable amount of the land previously identified as part of the Overlay District for the SNSA: namely, all or parts of the T.26S, R.59E Sections 14, 27, and 34; and T.27S, R.59E, Sections 9 and 10. In addition, the proposed ROW would also encompass the two entire sections of land required by CCDOA for flood control for the SNSA, and addressed in CCDOA's 2009 ROW application to BLM (T.26S, R.59E, Sections 23 and 26). See Map at Exhibit C. This raises two significant issues for consideration in the SEIS.</p> <p>First, we remind BLM of its express commitment to not authorize land uses that would preclude the siting of the SNSA stormwater facilities.<sup>7</sup> CCDOA is currently planning to use all or parts of T.26S, R.59E Sections 14, 23, 26, 27, and 34 for flood control purposes needed to support the construction and operation of the airport. Therefore, in the SEIS for First Solar South, BLM must examine the degree to which granting the full 13,043-acre ROW would interfere with the proposed SNSA and its ancillary facilities, and deny any part of First Solar's application that is incompatible with the uses proposed in the SNSA EIS.</p> <p>In the underlying FEIS, BLM adequately addressed the issue of FAA regulations at 14 CFR Part 77, which require that any party proposing to construct a structure taller than 200 feet or within 20,000 feet of a proposed airport must provide notice to the FAA through FAA Form 7460 and receive a Determination from the FAA regarding whether the proposed structure or structures are hazards to air navigation. CCDOA recommends that the SEIS incorporate a similar discussion of these critical regulatory obligations and include a mitigation measure such as MM HAZ-6.</p>
50-7	<p>Due to the proximity of the First Solar South Project to a proposed commercial service airport, any drainage or stormwater detention system constructed in conjunction with the Project should be consistent with FAA's guidance for avoiding wildlife attractants near airports. As part of its commitment to ensure compatible land uses near the SNSA (see Section 1, above), BLM has an obligation to ensure the Project complies with FAA guidelines. Therefore, the SEIS should also include a mitigation measure to prevent wildlife attractants near the planned airport. Per FAA's guidance, planning should address design requirements for any flood control, drainage or water detention systems and also address plans to avoid trash and debris that may attract wildlife.</p>
55-1	<p>It is our understanding that the Supplemental EIS will provide new information on these two phases of the proposed project. The EPA is unclear, however, if the newly proposed First Solar South will utilize the same Phase II and Phase III locations that were evaluated in the Silver State FEIS, or new areas within the larger ROW boundary.</p>

Comment ID	Comment
52-10	The purpose and need statement should not simply indicate that BLM is responding to an applicant's right of way application, as it has done for this and previous renewable energy projects.
55-4	<p>The Supplemental Draft Environmental Impact Statement should clearly identify the underlying purpose and need to which the BLM is responding in proposing the alternatives (40 CFR 1502.13). The purpose of the proposed action is typically the specific objectives of the activity, while the need for the proposed action may be to eliminate a broader underlying problem or take advantage of an opportunity.</p> <p>Recommendation: The purpose and need should be a clear, objective statement of the rationale for the proposed project. The SDEIS should discuss the proposed project in the context of the larger energy market that this project would serve and discuss how the project will assist the state in meeting its renewable energy portfolio standards and goals.</p> <p>The Silver State FEIS stated previously that the proposed project has been designed to deliver power to both the Nevada market, via Nevada Energy's Walter M. Higgins Power Generating Station, and the California market, via Southern California Edison's proposed 220 kilovolt (kV) upgraded Eldorado-Ivanpah Transmission project. According to the California Governor's office, California may already have sufficient renewable energy projects pending, in which case imported renewable energy from the neighboring states may not be needed.</p> <p>Recommendation: The SDEIS should clarify whether power generated from the First Solar South project will be delivered to the Nevada market or the California market and if power-purchase agreements have been signed.</p>

Comment ID	Comment
2-1	Greetings BLM, I would like to comment on the proposed solar project in Primm, NV. Specifically the First Solar proposal to construct photovoltaic panels, and related right-of-way appurtenances, including a substation and switchyard facilities.
3-1	I race several races in Primm. We no longer can race at so many places, it's ridiculous. People are starting to call Mexico the "Land of the Free" and they mean it. Of course with Mexico's problems, we are more free than they are, but eventhe (sic) idea of some people actually thinking our country is not free any more should be an alarm. Desert Racing is all about freedom, and indeed we are loosing (sic) a lot of that freedom lately.
8-1	After just experiencing a rather large power outage here in Southern California, one would think I would be all in favor of a proposed solar energy plant, but after reviewing the requested land requirements of the proposed project, I strongly advise against it.
13-1	<p>As a Las Vegas native, born and raised here since 1958, I have seen the area grow to what it is today. My family owned and started the Lee Canyon Ski area at Kyle Canyon. We also owned and started Nevada Airlines which was the first airline to start flying tours to the Grand Canyon out of Las Vegas. I myself have been involved with several different tour and travel related businesses in the area and have experienced the effects of some very good and very bad development decisions, planning issues, and growing problems that the Las Vegas Valley has endured.</p> <p>Please remember that first and foremost this is a city, like any other, and that approximately 2.5 million residents will have to live with the decision that you make regarding these projects.</p> <p>It is my understanding that these projects in whole have however become the problem of Nevada and the people that live in Las Vegas and the use of this area as we the people do not reap any of the benefits of either of these projects.</p>
15-1	<p>And anyway, I'd like to thank Greg Helseth for opening these meetings up to public comment.· I know you'll probably have more public participation tomorrow night up in Vegas, but the last time we were all here it didn't go quite as well as the California meeting.</p> <p>But anyways, I'm actually with a group that we formed as sort of an advocate called Basin and Range Life.· We formed this group primarily because we're concerned about the high volume of large renewable energy applications.</p>
18-1	Did you say you have people here from First Solar? Okay, I thought that. How many plants do you have in the area or around the country? Well, I was asking how many you had over the country. You didn't answer that.
16-3	<p>I'll take another bite at the apple. Rob Mrowka. And I just wanted to thank the BLM and First Solar for having this meeting and affording the opportunity for those of us who attended the opportunity to speak. The meeting at Stateline conducted by the California BLM, which kind of relates to the last gentleman's statement, they did not allow for questions and answers and it was an unfortunate situation. But I just want to commend the BLM of Nevada and First Solar for their openness in accepting comments.</p>

Comment ID	Comment
19-1	<p>I have a question for First Solar. Can you enlighten me on the financing for this project?</p> <p>How is this being paid for, funded?</p> <p>Price per acre. This is a lease, right, a 30-year lease?</p> <p>So does that cost per acre accelerate during the 30-year period or how does that work?</p> <p>Right. So as a Nevadan I would like to see, you know, if there was an increase, just like anything as time goes on, if it's going to be a potential 30-year lease I would, you know, like to know that we're getting a fair price here.</p> <p>Even though it's government lands, it's for public use which now energy is part of that. I mean, I'm not trying to make a problem here, I'm just saying just because it's government land doesn't mean that we have to stick with the same price for say 30 years. I mean, there should be some kind of cost of living. Is there something built into this contract?</p> <p>My comment is in reference to the fact that Nevada has 85 percent government land and, therefore, we are going to have a significant number of projects in Nevada, which if created in the appropriate corridors that will not impact existing communities. This one I think is a good project in terms of location; however, my concern is that with the number of projects that we may experience here in the state of Nevada over the next 30 to 50 years, where is the credit to the people or funds that would come back somehow to the state of Nevada? I just think this is out of balance. I think any state that is substantially impacted by solar or wind projects, that a portion of that money that goes to the U.S. Treasury, a portion of that should definitely come back to the state and should be used for education, health, additional parks to be created. I find the leases a little too open and they need to be negotiated a little tighter for the benefit of the residents of the state that is going to house these future projects.</p>
20-3	<p>My question is is there an estimate on what the North plant is going to be paying per acre for lease? Do you have any kind of an estimate?</p> <p>This question would be for First Solar. Do you find that to build the plant --you've also built plants in California. Is it easier to do it here in Nevada than it is in California, is that why you're building this plant?</p> <p>So if you would have had the same conditions and if you could move it closer to California where it's going, the power is going to be sent to, wouldn't it make more sense to do that?</p>



Comment ID	Comment
24-1	<p>The questions I have, I've looked at your maps, and my background is off-road races, putting on races. I've lived in Las Vegas my entire life.</p> <p>From my side all I've seen is the land being encroached on. I know it doesn't matter to most of the people here at the table because you live somewhere else and you don't live in Southern Nevada, but every time you turn around, if you live here, we're losing another piece of land, another piece of land is gone.</p> <p>You can't race here anymore because somebody is doing something here, a pipeline or whatever it might be. I'm all for taking care of our country and taking care of our government, the people that live here, but what I see on your map up there, you're encroaching on the land that we use.</p> <p>But it looks like you've encroached this way onto the Roach dry lake area. So from where I'm standing, at this point I'm totally against it.</p> <p>The other question I have, and maybe you can answer it, how much government money is -- is any government money involved with this?</p> <p>Well, I have one other comment. I was here in the field working a couple of days ago about I'd say last Friday, in fact, and I noticed a lot of the surveyor markers and flagging is up out there, and it looks to me like it's the boundaries of what I've seen on the map right there.</p> <p>The question I have is it looks to me like it's moved a lot further along than just this meeting. Listening to this lady speak over here, somebody's put a lot of dollars into this so far right now.</p> <p>I want to make it real clear, I'm one person here tonight. I guarantee you I can get 5,000 to 10,000 letters sent in that is against the project, because there's a huge following in the off-road community and those are the people that participate here. Do the letters have to be from Nevada only?</p>
25-2	<p>Does that raise a big red flag if they determine that, yes, we're going have to clean them now? I mean, does the flag go up? Does it create a problem? Is there a situation? I understand they know how to do this, but is it a situation where now you go back to the BLM and say, yeah, that raises -- we've got some concerns with that, and that's what my dad is worried about in the long run.</p> <p>I've got a question. I think the biologists can answer this. You mentioned at one of the meetings X amount of acres were allocated for these projects, this is going back about a year and a half, two years ago. Do you remember what that number of acres was? And it wasn't in one spot, it wasn't one location, it was scattered. Do you remember what that was?</p>
42-1	<p>I am concerned about public land being considered for a proposed solar project that is being requested by First Solar on approximately 13,000 acres in Primm, Nevada. As a tax payer and longtime user of the proposed Primm/ Jean land area, I would like to suggest that the First Solar site be removed from consideration for large scale energy developments.</p> <p>What is the BLM receiving from First Solar to approve this project? There must be some type of monetary offering.</p>
44-7	<p>Across my life, I have heavily visited public lands for foot travel recreation and for study. For 15 years I visited the Mojave Desert areas several times per year, while before and since, I have visited about once per year, as I now live over 400 miles away. However, I hope you will consider personal reasons such as my own pleasure and education. Many people who fail to speak up share myinterest (sic) in the Mojave, which is increasingly surrounded by heavily increasing population. This too, is a problem, and multiple use policies must be reviewed with the recognition that most uses which impact public lands diminish our heritage and future, as well as the present experience of those who choose uses with lightest impact.</p>
45-1	<p>Good morning. I looked at both the Federal Register and Southern Nevada BLM website and note there is no announcement as to when/where public meetings are to be conducted. There is also no way, that I can find, locate the Supplemental EIS to the Final EIS for this project. Please either send me the link to this information and/or the electronic copy of the SEIS. Thanks.</p>

Comment ID	Comment
47-1	I am resending this email as I still have not received a response. How am I suppose to make any comment when I cannot find what cahnges there are to the FEIS?
50-3	<p>Because the proposed Project differs in sig nificant ways from the Silver State Solar Project originally studied by BLM in a Final Environmental Impact Statement (FEIS) (serial no. N-85077; ROD issued on 10113/10), BLM has determined that a Supplemental Environmental Impact Statement (SEIS) must be prepared and has invited CCDOA to comment on any potential conflicts between the proposed Project and construction or operation of the SNSA.</p> <p>CCDOA meets regularly with First Solar representatives concerning its project near Primm (the "North" Project), which is currently under construction, and also concerning the proposed First Solar South Project. CCDOA and First Solar have worked successfully to reach conceptual agreement on a proposed plan of development for the Project that would not interfere with construction and operation of the SNSA.</p>
52-1	<p>Thank you for the opportunity to provide scoping comments to he lp guide the preparation of a Supplemental Environmental Impact Statement ("SEIS") and Proposed Amendment to the Las Vegas Resource Management Plan, for the Proposed Silver State South Solar Energy Project. The Bureau of Land Management ("BLM") published a Final Environmental Impact Statement ("FEIS") for the Proposed Silver State Solar Energy Project in August 2010 and approved the Silver State North Solar Energy Project, a 60 MW facility on approximately 600 acres of public land in the Ivanpah Valley on October 12, 2010. The purpose of the SEIS is to further evaluate the environmental impacts of the second phase of overall project, the proposed Silver State South Solar Energy Project, a 400 MW facility which would be located within a 13,043 acre right of way application area involving public land also located in Ivanpah Valley in the vicinity of Primm, NV. These comments are submitted on behalf of Defenders of Wildlife ("Defenders"), the Natural Resources Defense Council ("NRDC") and the Sierra Club, all non-profit public interest conservation organizations.</p> <p>Defenders has 1.1 million members and supporters nationally, including 3,900 in Nevada and 67,000 in California. Defenders is dedicated to protecting all wild animals and plants in their natural communities. To this end, we employ science, public education and participation, media, legislative advocacy, litigation, and proactive on-the-ground solutions in order to impede the accelerating rate of extinction of species, associated loss of biological diversity, and habitat alteration and destruction. NRDC has over 1.2 million members and online activists nationwide, more than 250,000 of whom live in California. NRDC uses law, science and the support of its members and activists to protect the planet's wildlife and wild places and to ensure a safe and healthy environment for all living things. NRDC has worked to protect wildlands and natural values on public lands and to promote pursuit of all cost effective energy efficiency measures and sustainable energy development for many years.</p> <p>The Sierra Club is a national nonprofit organization of approximately 1.3 million members and supporters (approximately 250,000 of whom live in California) dedicated to exploring, enjoying, and protecting the wild places of the earth; to practicing and promoting the responsible use of the earth's ecosystems and resources; to educating and enlisting humanity to protect and restore the quality of the natural and human environment; and to using all lawful means to carry out these objectives. The Sierra Club's concerns encompass protecting our public lands, wildlife, air and water while at the same time rapidly increasing our use of renewable energy to reduce global warming.</p> <p>The initial right of way application for the proposed project was received by BLM on 8/25/2008 and supplemented by another application for additional lands on 2/24/2011. The proposed project (Silver State South) includes installation of photovoltaic panels and related ROW appurtenances, including a substation and switchyard facilities, and project decommissioning. Assuming that a typical photovoltaic solar project requires approximately 10 acres to produce 1 MW, the footprint of the proposed project would cover approximately 4,000 acres. The location of the proposed project within the right-of-way application area was not provided in BLM's public scoping notice.</p>
54-1	I'm using this section for my comments in geneal, which are not specific to the EIS itself. Trac-on is making this comment and represents over 700 consistent weekend to weekend OHV users (i.e. not 3 time a year casual OHV users). Please note this while reading the comment of the overall representation.

Comment ID	Comment
55-3	<p>The Silver State Solar Energy project was initially launched as the Silver State South Solar Project (NVN-085077) and Silver State North Solar Project (NVN-085801). In 2009-10, the projects were merged into one project under one application (NVN-085801) located on 7,840 acres of public land east of Primm, Nevada. Initially, the 400 megawatt photovoltaic project was proposed in three phases: Phase 1 - 60 MW; Phase 2 - 140 MW; Phase 3 - 200 MW. The Bureau of Land Management approved the 60 MW Phase 1 portion of the project in the October 12, 2010 Record of Decision, but did not approve Phase 2 or Phase 3. In response to this action, Silver State Solar, LLC has submitted a new right-of-way application (NVN-89530), which expands on the previous ROW application, for the construction of a new, solar energy facility on 13,043 acres of public land east of Primm, Nevada. The proposed solar energy project would consist of PV panels, a substation and a switch yard.</p>

Comment ID	Comment
13-2	I do support the idea of responsible green and renewable energy and understand the impact that it could have on the entire southwest region. I can only hope that the agencies involved will consider all aspects of the project or projects impact on Southern Nevada and the Southwest as a whole.
15-5	<p>And I'm not going to go into the details of the problems with that project, but the cumulative threat to a lot of these lands are adding up with the Stateline Project on this side and Silver State 13,000 acre right-of-way.</p> <p>It's very large and I'm told that it will probably be about 4,000 acres. That if you take a look at the size of what's out there now, the 400 acres, you're going to have to surround that eight times that amount solar panels.</p>
21-3	Actually I should probably also ask about the cumulative effect in the whole Ivanpah Valley. I'm sure he will evaluate that too.
26-2	In the EIS and Record of Decision (ROD) for the related Silver State Solar Energy Project (N-085077 2800 (NVS3100)), we did not find an assessment of the direct, indirect and cumulative impacts that the project would have on areas where MSHCP actions have been funded. These areas include, at a minimum, the areas noted in our letter addressed to you dated July 14, 2010 (see attached). We request that the BLM address this issue in the subject analysis and use the Supplemental EIS opportunity to analyze these impacts for the entirety of the Silver State Solar Project, including those areas addressed by the prior EIS (N-085077 2800 (NVS3100)) and the subject Supplemental EIS, and to recommend appropriate mitigation for the permanent loss of MSHCP mitigation areas.
30-1	Unfortunately, the proposed location of the First Solar South project is on resource-rich public land making it a very poor choice of site for a power plant project. The First Solar South power plant project including a photovoltaic solar plant and associated facilities would occupy 13,043 acres of federal land managed by the Bureau of Land Management (BLM). The project would be located on relatively undisturbed public lands that provide high quality habitat for the listed desert tortoise, and if approved would have significant direct, indirect and cumulative impacts on desert tortoises and their habitat, rare plants, ground water, and visual resources.
30-7	<p>The NEPA documents should provide a detailed review and analysis of the direct, indirect and cumulative impacts of the proposed project and all associated infrastructure including roads and transmission lines on the desert tortoise population.</p> <p>Department of the Interior Order No. 3226 mandates that the BLM must consider the impacts of each proposed alternative with respect to global climate change in its NEPA reviews. The agencies should use the recently released USGS desert tortoise habitat model to determine likely changes in desert tortoise habitat quality in the area and the importance of the desert tortoise habitat. In addition to addressing climate change in the cumulative effects analysis, the DEIS should address the carbon footprint of the project and any losses to carbon storage and sequestration it will engender.</p>

Comment ID	Comment
30-20	<p>The DEIS must considered the cumulative effects of this project in combination with all the other consumptive uses that are occurring on these public lands including grazing, off road vehicle activity, energy projects, and mining. New transmission line projects have the potential to open up more lands to energy (or other) development, placing wide swaths of habitat at risk, and greatly increase degradation and fragmentation of habitats and important wild land areas and have lasting and damaging impacts. The project will act cumulatively with the many other energy developments that are planned for the area.</p> <p>The NEPA documents must explain the monitoring programs that will be in place to monitor the short and long term impacts of the project. This should include the timelines, and estimated costs and sources of funding for the monitoring programs.</p> <p>BLM is obligated under FLPMA to “minimize adverse impacts on the natural, environmental, scientific, cultural, and other resources and values (including fish and wildlife habitat) of the public lands involved.” [43 U.S.C. §1732(d)(2)(a)] Other laws, including the Endangered Species Act and the California Endangered Species Act also entail the need for mitigations to minimize impacts. BLM is required to consider measures to mitigate potential environmental consequences in its NEPA analysis. [40 C.F.R. § 1502.16] The NEPA implementing regulations define "Mitigation" to include:</p> <ul style="list-style-type: none"> <li>(a) Avoiding the impact altogether by not taking a certain action or parts of an action.</li> <li>(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.</li> <li>(c) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.</li> <li>(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.</li> <li>(e) Compensating for the impact by replacing or providing substitute resources or environments.</li> </ul> <p>The DEIS should explain the mitigation measures that will meet all these requirements including “Avoiding the impact altogether by not taking a certain action or parts of an action”. The primary mitigation for impacts to desert tortoise, rare plants and other special status species should be acquisition of compensation habitat since this is the only mitigation measure that will offset the habitat loss. Acquisition of habitat should be accompanied with enhancement measures to compensate for the net loss of habitat. These measures may include removal of livestock, fencing where appropriate, invasive species control, small scale restoration projects, acquisition of water rights and route closures.</p> <p>The DEIS should describe the restoration and rehabilitation activities that will be required for habitat disturbed during construction. For example, construction material yards will lose their native vegetation, have their soils compacted, and increase the amount of wind and water erosion while leaving these areas at an increased risk of weed invasion. Transporting materials, labor, and equipment in and out of construction areas will also have their own set of impacts that must be minimized. Construction may also require the use of “temporary” roads that will require extensive rehabilitation if they are not to become permanent intrusions on the landscape. Rehabilitation of desert habitat is a long, slow and uncertain process.</p>
43-1	<p>First, I am concerned about the cumulative impacts of a ll of the proposed solar and wind facilities on the desert. The EIS should consider the possibility that many of these projects will be built, and what effect this will have on the integrity of the ecology of the desert, as well as impacts to visual resources and water use. Indeed, the BrightSource Ivanpah project is already underway and it will seriously damage the integrity of the Ivanpah Valley. Is the loss of tens of thousands of acres of public land in the public interest?</p>
44-4	<p>The Ivanpah Solar Electric Generating System, already under construction, will impact the area and enlarging that impact severely diminishes the wildlife corridor effect that remains.</p>

Comment ID	Comment
50-6	<p data-bbox="205 120 2043 175">It is critical to understand the degree to which the following aspects of the First Solar South Project would affect both amount and rate of stormwater flows to the SNSA Site:</p> <ul data-bbox="205 214 2043 402" style="list-style-type: none"> <li data-bbox="205 214 2043 269">• Increased impervious surface (because of paved access road, new buildings, and new parking lot);</li> <li data-bbox="205 274 2043 329">• Altered rate of flow due to cumulative effect of the solar panels from both projects (Silver State North and South) and First Solar's stormwater infrastructure (e.g., berms, debris basins, and level spreader detention basins);</li> <li data-bbox="205 334 2043 362">• Altered rate of sediment flow due to impacts to up gradient vegetation; and</li> <li data-bbox="205 367 2043 402">• Potential increased amount of flow (if the project applicant proposes to truck in substantial quantities of water per year).</li> </ul> <p data-bbox="205 441 2043 532">For that reason, CCDOA recommends that the SEIS examine the direct effects to existing drainage patterns and the cumulative effects to drainage, taking into account the SNSA drainage plans. CCDOA has already provided a detailed planning report for the proposed SNSA stormwater facilities to the BLM Las Vegas Field Office for use in the SNSA EIS. CCDOA stands ready to provide additional copies of this report or any additional information that may assist the BLM or project applicant.</p>
51-1	<p data-bbox="205 561 2043 652">We concur with the BLM's assessment in its Notice of Intent that key issues relative to Silver State South include impacts to threatened and endangered species. There is no more important issue to consider, in our view, than the direct and indirect impacts of the proposed project to the Federally-threatened desert tortoise (<i>Gopherus agassizii</i>) and the cumulative impacts of this and other developments to this unique species and its habitat in the Ivanpah Valley.</p> <p data-bbox="205 691 2043 844">The Council is deeply concerned about the significant adverse impacts to desert tortoises from the Ivanpah Solar Electric Generating System (ISEGS) and the Silver State North solar projects already under construction on nearly 3,582 and 618 acres, respectively, of what was once high quality, occupied habitat. The Stateline project proposed by First Solar (some 2,200 acres) and the Silver State South solar project (with an estimated 4,000 acre footprint) would expand the destruction of desert tortoise habitat to over 10,000 acres. The remaining habitat will be seriously fragmented. Together, the four solar projects threaten the survival of the Mojave desert tortoise as a viable population in the Ivanpah Valley.</p>

52-8

The alternatives mentioned in the scoping notice show some effort to address these impacts but not nearly enough. Given the enormous impacts of the BrightSource Ivanpah project on the Desert tortoise and its habitat, it is incumbent on BLM and the U.S. Fish and Wildlife Service (FWS) to determine whether the Ivanpah Valley can sustain any further degradation and loss of habitat without irreparable harm to the Desert tortoise populations not only in Ivanpah Valley, but in the Eastern Mojave and Northeastern Mojave Recovery Units, and adversely impact recovery of this declining and threatened species. Lastly, we strongly recommend that BLM review the adequacy of the biological resources survey for the proposed project because there are some species that have a very high probability of occurring on the project area based on their documented occurrence at the Ivanpah SEGS site. Two such species are the Western burrowing owl and American badger, and there are several more.

We have repeatedly asked BLM in both California and Nevada to assess the current and projected ecological conditions in the entire Ivanpah Valley region given the current and projected loss of natural biological communities due to existing, proposed and planned land use projects in this region, including a number of large scale solar projects.

Furthermore, we have advocated that BLM complete such a regional assessment before continuing to process solar energy project applications in either California or Nevada. That analysis should precede and inform any new project proposals and alternative project designs in this area. We strongly urge the BLM to suspend processing of current and future right-of-way applications in the Ivanpah Valley as a whole until the ecological health of the habitat and the conservation needs of the Desert tortoise and other at-risk species are determined in a systematic manner utilizing subject matter experts from the relevant agencies, academic institutions and professional organizations. We do not consider a cumulative effects analysis under NEPA to be substitute for a comprehensive ecological analysis of the Ivanpah Valley region.

We are deeply concerned over the significant adverse impacts to Desert tortoises and their high-quality habitat in the Ivanpah Valley due to the 3,500 acre Ivanpah and the 618 acre Silver State North solar projects that are already under construction. The proposed project and the proposed Stateline solar project in California would expand these impacts by approximately 6,000 acres (Stateline – 2,000 acres; Silver State South – est. 4,000 acres).

High quality, occupied Desert tortoise habitat in the Ivanpah Valley links similar habitat and Desert tortoise populations in the Eastern Mojave Recovery Unit and the Northeastern Mojave Recovery Unit. Even using the new recovery unit boundaries in the revised recovery plan for the desert tortoise, it is clear that this area remains a key connectivity pinch-point between the populations and recovery units. Hagerty et al. (2011) also shows that the Ivanpah Valley is a critical movement corridor for desert tortoise gene flow.

The FWS determined that loss of connectivity in the vicinity of Primm, Nevada would likely create a nearly closed population in the southern end of the Ivanpah Valley, largely due to topographic constraints between Ivanpah Valley and Cima, located in the far southern reaches of Ivanpah Valley. Furthermore, FWS in the Revised Biological Opinion for the Ivanpah SEGS (pp. 75-76), stated:

Although the available information does not support a conclusion that connectivity would be lost in the vicinity of Primm, leading to population-level genetic and demographic effects in the southern end of the Ivanpah Valley, the existing effects of fragmentation caused by the LSTS fence, Interstate 15, Primm, and the Clark Mountains are likely to be exacerbated by the development of the ISEGS facility. Although culverts and underpasses, north of Primm and west of Roach Lake, and between Yates Well Road and Nipton Road, offer some small potential for population connectivity to this area, we have concluded that dispersal of desert tortoises through these underpasses does not likely contribute significantly to population connectivity. This lack of significant connectivity has resulted in a population west of Interstate 15 that is completely or nearly isolated from the remainder of the desert tortoise population in the southern end of the Ivanpah



Comment ID	Comment
52-8	<p data-bbox="207 110 275 136">Valley.</p> <p data-bbox="207 175 2043 688">The isolated population west of Interstate 15 is significantly smaller than the minimum viable population size identified in Service (1994), indicating that it is highly vulnerable to demographic stochasticity and genetic deterioration. The development of the ISEGS facility in the area occupied by this isolated population is likely to promote or exacerbate these effects by reducing the area available to this population and introducing additional mortality sources that may reduce population recruitment or create demographic imbalances. The potential mortality of juvenile individuals on the ISEGS project site will also likely have some effects on population recruitment (i.e., individuals reaching reproductive age). In addition to exacerbating demographic and genetic effects within this small population, the ISEGS facility would further fragment the small population west of Interstate 15 by constraining connectivity between populations east and west of the facility. However, because population connectivity would still remain to the north of Unit 3 and BrightSource would install culverts underneath its access road to alleviate fragmentation associated with it, we anticipate that populations to the west and east of ISEGS would still largely be connected.</p> <p data-bbox="207 721 2043 844">It is clear from the revised biological opinion for the ISEGS project, dated June 10, 2011, that the FWS was concerned about the already compromised and potentially isolated Desert tortoise population occurring west of I-15 in the Ivanpah Valley. Thus, it is essential that BLM, in consultation with FWS, fully analyze and disclose the implications that the proposed project would have on the continued viability of the Desert Tortoise generally east of I-15 and to carefully determine 1) how and where habitat connectivity and gene-flow occurs, and 2) how it can be maintained and enhanced.</p>
52-12	<p data-bbox="207 873 2043 935">Cumulative impacts of the proposed project, and other existing and reasonably foreseeable land uses, on at-risk species and their habitats on a regional scale need to be carefully analyzed.</p> <p data-bbox="207 971 2043 1065">Cumulative impacts need to be analyzed and considered in the context of various laws and regulations pertaining to management of public lands in the Ivanpah Valley region, including lands in Nevada and California. Impacts must be assessed within a management framework that includes the Endangered Species Act, Federal Land Policy and Management Act, and BLM Manuals 6840 (Special Status Species Management), 6500 (Wildlife Habitat Management) and 4180 (Public Land Health).</p> <p data-bbox="207 1101 2043 1224">Regarding cumulative impacts, we strongly urge BLM to consider the impact of the following existing and foreseeable land uses on the greater Ivanpah Valley, its ecological condition, and its biological communities: 1) Ivanpah Solar Electric Generating System; 2) I-15 Freeway; 3) gas and electrical transmission facilities; 4) Stateline solar project – proposed; 5) Joint Port of Entry station – proposed; 6) High Desert Xpress railroad; 7) Ivanpah airport – planned; and 8) Kern River Gas Pipeline extension – proposed.</p>
53-1	<p data-bbox="207 1250 2043 1308">All environmental impacts need to have their cumulative impacts analyzed in association with the impacts from the existing and other proposed projects in the Ivanpah Valley area.</p>

55-2

Since cumulative impact often occur at the landscape or regional level, we are particularly concerned about the impacts associated with the influx of large" scale renewable energy project in the Ivanpah Valley.

The cumulative impacts analysis should identify how resources, ecosystems, and communities in the vicinity of the project have already been, or will be, affected by past, present, or future activities in the project area. These resources should be characterized in terms of their response to change and capacity to withstand stresses. Trends data should be used to establish a baseline for the affected resources, to evaluate the significance of historical degradation, and to predict the environmental effects of the project components.

For the cumulative impacts assessment, we recommend focusing on resources of concern or resources that are "at risk" and/or are significantly impacted by the proposed project, before mitigation. For this project, the BLM should conduct a thorough assessment of the cumulative impacts to aquatic and biological resources, including impacts to desert tortoise, especially in the context of the renewable energy developments occurring and proposed in the Ivanpah Valley area. As mentioned, cumulative impacts to desert washes and ecosystems are occurring and will continue to occur from multiple large solar installations in the desert, therefore cumulative impacts to this resource should be thoroughly discussed for this project as well.

The EPA supports a regional assessment of the potential cumulative effects of other projects in the Ivanpah Valley to a range of resources, including aquatic, biological, and cultural resources. These findings should help inform current and future development proposed in the region. The EPA assisted in the preparation of a guidance document' for assessing cumulative impacts in California that we find to be very useful. While this guidance was prepared for transportation projects in California, the principles and the 8-step process outlined therein can be applied to other types of projects and offers a systematic way to analyze cumulative impacts for a project. In accordance with this guidance, the EPA recommends that the SDEIS identify which resources are analyzed, which ones are not, and why. For each resource analyzed, the SDEIS should:

- Identify the current condition of the resource as a measure of past impacts. For example, the percentage of species habitat lost to date.
- Identify the trend in the condition of the resource as a measure of present impacts. For example, the health of the resource is improving, declining, or in stasis.
- Identify all on-going, planned, and reasonably foreseeable projects in the study area that may contribute to cumulative impacts.
- Identify the future condition of the resource based on an analysis of impacts from reasonably foreseeable projects or actions added to existing conditions and current trends.
- Assess the cumulative impacts contribution of the proposed alternatives to the long-term health of the resource, and provide a specific measure for the projected impact from the proposed alternatives.
- When cumulative impacts are identified for a resource, mitigation should be proposed.
- Disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts.
- Identify opportunities to avoid and minimize impacts, including working with other entities.

Recommendations:

The SDEIS should consider the cumulative impacts associated with multiple renewable energy and other development projects proposed in the Ivanpah Valley area and the potential impacts on various resources including: water supply, endangered species, and habitat.

The BLM and project proponents should conduct a regional assessment of resource impacts, given the number of projects under construction or planned for the region.

As an indirect result of providing additional power, it can be anticipated that these projects will allow for development and population growth to occur in those areas that receive the generated electricity.

Recommendation:

The SDEIS should describe the reasonably foreseeable future land use and associated impacts that will result from the additional power supply. The document should

Comment ID	Comment
55-2	provide an estimate of the amount of growth, the likely location of such growth, and the biological and environmental resources at risk.
56-1	My first issue is how the cumulative impacts of this project, the Ivanpah Solar Electric Generating Station, the Stateline Solar Farm project and the potential Ivanpah Airport and Desert Express High Speed Train projects will be evaluated.